

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

-----x  
DONNA CURLING, et al., :  
Plaintiffs, :  
vs. : Civil Action No.  
BRAD RAFFENSPERGER, et al., : 1:17-cv-02989-AT  
Defendants. :  
-----x

VIDEOTAPED VIRTUAL DEPOSITION OF  
BLAKE EDWARD VOYLES  
Atlanta, Georgia  
Wednesday, November 16, 2022  
9:52 a.m.

Job No: 5584994

Pages 1 - 196

Reported by: Cappy Hallock, RPR, CRR

Videotaped Virtual Deposition of BLAKE  
EDWARD VOYLES, held by Zoom.

Pursuant to Notice, the Videotaped  
Virtual Deposition of BLAKE EDWARD VOYLES was  
taken commencing at 9:52 a.m. on Wednesday,  
November 16, 2022 before Cappy Hallock, Registered  
Professional Reporter, Certified Realtime  
Reporter, and Notary Public in and for the State  
of Maryland.

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3 Also Present: Jenna Conaway

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8 Susan Greenhalgh

9 Ernestine Thomas-Clark

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20 Videographer: Ira Lawrence

21 Reporter: Cappy Hallock, RPR, CRR

I N D E X

Deposition of BLAKE EDWARD VOYLES

November 16, 2022

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Exhibit 3 11-10-20 Coffee County Board of Elections and Registration Monthly Board Meeting, Bates Nos. CGG20220001857 to 858	33

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5 with attachment

6 Exhibit 5 11-16-20 e-mail, Hampton to 40  
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8 Exhibit 6 12-16-20 e-mail, redacted to 46  
9 bemardkerik, et al., with  
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11 Exhibit 7 12-21-20 e-mail, to Voyles, 49  
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14 Exhibit 8 Secretary of State's Office 53  
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18 Exhibit 9 12-15-20 e-mail, to Marks, 74  
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20 Exhibit 10 1-7-21 12:54 p.m. photographs 85

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7 Voting System Components at

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1 P R O C E E D I N G S

2 - - - - -

3 THE VIDEO OPERATOR: Good morning. We 09:51:42  
4 are going on the record at 9:52 a.m. on November 09:51:54  
5 16th, 2022. Please note that this deposition is 09:52:01  
6 being conducted virtually. Quality of recording 09:52:06  
7 depends on the quality of camera and internet 09:52:10  
8 connection of participants. What is seen from the 09:52:14  
9 witness and heard on screen is what will be 09:52:17  
10 recorded. Audio and video recording will continue 09:52:20  
11 to take place unless all parties agree to go off 09:52:23  
12 the record. 09:52:27  
13 This is Media Unit 1 of the video 09:52:28  
14 recorded deposition of Blake Edward Voyles taken 09:52:32  
15 by counsel for the plaintiffs in the matter of 09:52:36  
16 Donna Curling, et al. versus Brad Raffensperger, 09:52:40  
17 et al., filed in the United States District Court 09:52:48  
18 for the Northern District of Georgia, Case Number 09:52:52  
19 1-17-cv-02989-AT. 09:52:58  
20 This deposition is being conducted 09:53:10  
21 remotely using virtual technology. My name is Ira 09:53:11

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1 Lawrence representing Veritext and I am the 09:53:16  
2 videographer. The court reporter is Cappy Hallock 09:53:21  
3 from the firm Veritext. 09:53:26  
4 I'm not authorized to administer an 09:53:28  
5 oath. I'm not related to any party in this action 09:53:31  
6 nor am I financially interested in the outcome. 09:53:34  
7 If there are any objections to proceeding, please 09:53:37  
8 state them at the time of your appearance. 09:53:40  
9 Counsel and all present, including 09:53:44  
10 remotely, will now state their presence and 09:53:47  
11 affiliations for the record. 09:53:50  
12 MR. BROWN: Bruce Brown representing 09:53:52  
13 the plaintiffs and the Coalition. 09:53:53  
14 MR. GRUBMAN: Scott Grubman 09:53:59  
15 representing the witness, Ed Voyles. 09:54:01  
16 MS. LaROSS: Diane LaRoss representing 09:54:05  
17 the State Defendants. 09:54:08  
18 MR. TYSON: Brian Tyson also 09:54:10  
19 representing the State Defendants. 09:54:11  
20 MR. JACOUTOT: Bryan Jacoutot also 09:54:13  
21 representing the State Defendants. 09:54:15

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1 THE VIDEO OPERATOR: Will the court 09:54:21  
2 reporter please swear in the witness and then 09:54:23  
3 counsel may proceed. 09:54:25

4 MR. GRUBMAN: Before the swearing in I 09:54:28  
5 need to get something on the record. 09:54:29

6 We are sitting here at 9:54 a.m. 09:54:31  
7 Mr. Brown sent out the deposition notice for 9 09:54:37  
8 a.m. It is November 16th, 2022. Every lawyer on 09:54:40  
9 this Zoom has taken probably two dozen Zoom 09:54:45  
10 depositions between March of 2020 and November of 09:54:48  
11 2022, yet it took over 45 minutes for Mr. Brown to 09:54:51  
12 send a valid working link in this case. 09:54:56

13 My client is a nonparty witness who 09:54:58  
14 had to sit here on my dime for over 45 minutes 09:55:01  
15 because Mr. Brown could not be bothered to test 09:55:05  
16 the links last night or this morning. Now, after 09:55:09  
17 9:45, I have been informed for the first time by 09:55:14  
18 someone who spoke, I wasn't sure who, that this 09:55:18  
19 Zoom deposition, just the Zoom, doesn't involve 09:55:22  
20 the exhibits, which every other Zoom deposition I 09:55:26  
21 have ever taken since the beginning of Covid have. 09:55:29

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1 But apparently we now have to download something 09:55:33  
2 separate which I clicked the link which I just got 09:55:36  
3 this morning and it said I have to create an 09:55:40  
4 account. 09:55:43

5 So now I have to go back off the 09:55:44  
6 record. I have to create two accounts because me 09:55:46  
7 and Mr. Voyles are on different computers. And I 09:55:49  
8 want to state for the record that Mr. Brown's 09:55:51  
9 unprofessionalism has caused my client to pay 09:55:54  
10 unnecessary legal fees. Mr. Voyles reserves the 09:55:56  
11 right to file a motion requiring Mr. Brown to 09:56:00  
12 reimburse him for said legal fees. 09:56:00

13 We will now go off the record. I will 09:56:04  
14 download two more programs that I was just 09:56:06  
15 informed of. 09:56:08

16 Mr. Brown, you have been practicing a 09:56:09  
17 long time. I recommend moving forward, when you 09:56:13  
18 are dealing with a witness who is not a party to a 09:56:14  
19 litigation, you do everything in your power to 09:56:16  
20 make sure that that witness' time and his 09:56:20  
21 counsel's time is not wasted. You have failed to 09:56:22

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1 do that now. We are going to reserve our right to 09:56:26  
2 seek sanctions against you personally. 09:56:30

3 So now we will go off the record. I 09:56:30  
4 will download this new link, and I will come back 09:56:31  
5 on. I will also note that I am considering this 09:56:33  
6 deposition to have started at 9 a.m. when 09:56:36  
7 Mr. Brown noticed it for. He is on the clock. 09:56:40

8 MR. BROWN: And with that we will go 09:56:45  
9 off the record and let Mr. Grubman get the link 09:56:45  
10 that we always use to share exhibits in this case. 09:56:52

11 THE VIDEO OPERATOR: The time on the 09:57:04  
12 monitor is 9:57 a.m. and we are off the record. 09:57:05

13 (Recess taken -- 9:57 a.m.) 09:57:09

14 (After recess -- 9:59 a.m.) 09:57:15

15 THE VIDEO OPERATOR: Stand by. 10:00:03

16 The time on the monitor is 10 a.m. and 10:00:04  
17 we are on the record. 10:00:09

18 MR. BROWN: Please swear in the 10:00:14  
19 witness. 10:00:15

20 THE REPORTER: I do have a brief 10:00:15  
21 stipulation to read into the record before we 10:00:15

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1	start.	10:00:15
2	MR. BROWN: Please.	10:00:15
3	THE REPORTER: Will the attorneys	10:00:15
4	participating in this deposition acknowledge that	10:00:15
5	I am not physically present in the deposition	10:00:15
6	room, and that I will be reporting this deposition	10:00:15
7	remotely. Will they further acknowledge that in	10:00:15
8	lieu of an oath administered in person, I will	10:00:15
9	administer the oath remotely.	10:00:15
10	And will the parties further agree	10:00:15
11	that if the witness is testifying from a state	10:00:15
12	where I am not a notary that the witness may be	10:00:15
13	sworn in by an out-of-state notary.	10:00:15
14	Do all parties present agree?	10:00:15
15	MR. BROWN: Yes.	10:00:53
16	MR. GRUBMAN: Agreed.	10:00:55
17	MS. LaROSS: That's agreeable.	10:00:59
18	THE REPORTER: Thank you.	10:01:00
19	And Mr. Voyles, if I could please ask	10:01:00
20	you where you are right now, city and state.	10:01:00
21	THE WITNESS: Atlanta, Georgia.	10:01:00

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1 THE REPORTER: Say it again, please? 10:01:00

2 THE WITNESS: Atlanta, Georgia. 10:01:00

3 THE REPORTER: Thank you. 10:01:00

4 WHEREUPON, 10:01:00

5 BLAKE EDWARD VOYLES, 10:01:00

6 A Witness called for examination, having 10:01:00

7 been first duly sworn, was examined and testified 10:01:00

8 as follows: 10:01:00

9 EXAMINATION 10:01:38

10 BY MR. BROWN: 10:01:38

11 Q Please state your name for the record. 10:01:39

12 A Blake Edward Voyles, and everybody 10:01:42

13 just calls me Ed. 10:01:44

14 Q Mr. Voyles, my name is Bruce Brown. I 10:01:46

15 represent the Coalition plaintiffs in this case. 10:01:49

16 You said you were in Atlanta now; is that right? 10:01:52

17 A Correct. 10:01:55

18 Q Are you there with your lawyer? 10:01:55

19 A I am, in his office. 10:01:57

20 Q And what is your home address? 10:01:59

21 A [REDACTED], Douglas, 10:02:03

1 Georgia. 10:02:08

2 Q I need to ask this just as a 10:02:12

3 formality, but are you under any drugs or 10:02:14

4 medication that would have an impact upon your 10:02:17

5 ability to give accurate testimony today? 10:02:19

6 A No. 10:02:22

7 Q Mr. Voyles, you are a former member of 10:02:27

8 the Coffee County Board of Elections; is that 10:02:31

9 right? 10:02:37

10 A Correct. 10:02:38

11 Q What years were you on the board? 10:02:39

12 A Oh, jeez. That's years ago. I don't 10:02:41

13 know. I was on there for quite a number of years. 10:02:45

14 I have been off several years. I'm not exactly 10:02:48

15 sure. 10:02:51

16 Q You were off the board by the time of 10:02:52

17 the 2020 general election; is that fair to say? 10:02:54

18 A Correct. 10:02:57

19 Q How much before, like a year, couple 10:02:58

20 months, do you recall? 10:03:00

21 A So here, here is how I would remember 10:03:02

1       it. I think it was the first term when Secretary       10:03:06  
2       of State Raffensperger was running and there was a       10:03:11  
3       runoff. That's when I resigned.       10:03:17

4             Q       Was there a reason why you resigned       10:03:19  
5       but you had just spent enough time doing it?       10:03:21

6             A       Yeah. I had spent enough time, that's       10:03:25  
7       for sure. I disagreed with the -- I don't even       10:03:28  
8       know what it was called, but counting the votes       10:03:35  
9       that came in by mail after close of election       10:03:39  
10       consent order maybe, close of election on the       10:03:42  
11       Tuesday evening. So we were to count them through       10:03:48  
12       the remainder of the week and I just decided I       10:03:52  
13       didn't need to be on the board anymore so I       10:03:56  
14       resigned.       10:03:58

15            Q       For what election was that again that       10:04:00  
16       that problem arose?       10:04:03

17            A       It was the runoff for, if I'm not       10:04:06  
18       mistaken, it was the runoff for Secretary       10:04:08  
19       Raffensperger's first term.       10:04:14

20            Q       It would have been 2018?       10:04:17

21            A       I don't know.       10:04:19

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1 Q After you resigned from the board, 10:04:20

2 what was your involvement generally with elections 10:04:24

3 in Coffee County? 10:04:28

4 A Not a lot. I would drop in 10:04:31

5 occasionally and see and talk to people. 10:04:33

6 Q I mean, what was your purpose of 10:04:37

7 dropping in? 10:04:39

8 A I mean, small town. South Georgia. 10:04:40

9 See people, catch up. 10:04:46

10 Q Did you start visiting the office more 10:04:54

11 around the 2020 election? 10:04:56

12 A I think I did, yes. 10:04:59

13 Q Why? 10:05:01

14 A A lot of activity and things going on, 10:05:04

15 asking questions and just catching up on 10:05:07

16 everything. 10:05:10

17 Q You were there as a private citizen? 10:05:10

18 A Yes, sir. 10:05:13

19 Q You did not have an official role with 10:05:14

20 the Board of Elections, right? 10:05:17

21 A No, sir. 10:05:21

Page 20

1 MR. BROWN: If we could -- I should 10:05:23  
2 have asked this earlier but if we could mark as 10:05:27  
3 Exhibit 1 the subpoena, which is Tab 0. 10:05:30  
4 Are you able to see that exhibit? 10:05:41  
5 THE WITNESS: Would you show me how to 10:05:44  
6 pull it up? 10:05:45  
7 MR. GRUBMAN: Where are we supposed to 10:06:18  
8 be seeing it? I don't see it on -- Exhibit Share? 10:06:18  
9 MR. BROWN: Exhibit Share. So just 10:06:18  
10 click on there, click on Accounts. 10:06:19  
11 All right, he can see it. 10:06:24  
12 (Voyles Deposition Exhibit No. 1 was 10:06:24  
13 marked for identification.) 10:06:24  
14 BY MR. BROWN: 10:06:26  
15 Q Mr. Voyles, you were served with a 10:06:26  
16 subpoena to testify today, right? 10:06:28  
17 A Yes, sir. 10:06:30  
18 Q You were also served with a document 10:06:30  
19 subpoena to ask you to produce documents; is that 10:06:33  
20 right? 10:06:35  
21 A Yes, sir. 10:06:36

1           Q       And you have been collecting documents       10:06:36  
2       with your attorney and produced some yesterday,       10:06:38  
3       correct?       10:06:41  
4           A       Yes, sir.       10:06:41  
5           Q       And can you tell me just in general       10:06:42  
6       what you did to find -- up to this point. I know       10:06:44  
7       your work is going to be continuing, but up to       10:06:49  
8       this point what you have done to collect       10:06:52  
9       documents?       10:06:55  
10          A       I screen shot text messages and       10:06:58  
11       printed them.       10:07:03  
12          Q       What else did you do?       10:07:09  
13          A       Perused my phone for any of the       10:07:11  
14       information that I was asked for.       10:07:14  
15          Q       You said you perused it? Did you       10:07:17  
16       collect --       10:07:21  
17          A       Pardon me?       10:07:22  
18          Q       Did you look carefully?       10:07:23  
19          A       As carefully as I could, yes.       10:07:24  
20          Q       And did you look at your e-mails also?       10:07:27  
21          A       Yes, sir.       10:07:29

1           Q       And you use text messages, right, just       10:07:34  
2       on your phone?   10:07:39

3           A       Yes, sir.                                       10:07:40

4           Q       You use Signal also?                       10:07:40

5           A       At one point I had, a little, very       10:07:42  
6       little.   10:07:45

7           Q       And at what point was that?               10:07:46

8           A       After someone had me download it. I       10:07:50  
9       don't remember when that would have been.           10:07:53

10          Q       Was that right around the 2020           10:07:56  
11       election?   10:07:58

12          A       Most likely, yes.                           10:07:59

13          Q       And were you able to recover any       10:08:00  
14       Signal messages?                                       10:08:02

15          A       I was not.                                   10:08:04

16          Q       Did you check -- did you try?           10:08:05

17          A       I had deleted that app sometime. I       10:08:06  
18       don't even know when or how to check to see when   10:08:11  
19       it was deleted.                                       10:08:16

20                   MR. BROWN: Okay. Let me mark as       10:08:18

21       Exhibit 2 Tab 1.                                       10:08:20

1 (Voyles Deposition Exhibit No. 2 was 10:08:39  
2 marked for identification.) 10:08:39  
3 BY MR. BROWN: 10:08:40  
4 Q Do you see that, sir? 10:08:40  
5 A Yes, sir. 10:08:42  
6 Q I will represent to you, and you do 10:08:42  
7 not have to accept this representation as true, 10:08:44  
8 but I will represent to you that we have compiled 10:08:48  
9 based on the security video in the Coffee County 10:08:50  
10 election office the dates and times where you went 10:08:58  
11 in and out of the election office. And what we 10:09:01  
12 have found is shown in Exhibit 2. And as you will 10:09:03  
13 see, the different columns, the month and the day, 10:09:07  
14 the time you arrived and the time you leave. 10:09:13  
15 Do you see that? 10:09:16  
16 A Yes. 10:09:18  
17 MR. GRUBMAN: Hold on one second, Mr. 10:09:19  
18 Voyles. I am going to object -- 10:09:20  
19 MR. BROWN: Mr. Grubman, Mr. Grubman, 10:09:41  
20 Mr. Grubman, we can't -- 10:09:41  
21 MR. GRUBMAN: You wait until I am done 10:09:43

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1	objecting.	10:09:43
---	------------	----------

2 THE REPORTER: Excuse me. I'm the -- 10:09:43

3 MR. BROWN: No one can hear you, 10:09:43

4 | Scott. No one can hear you. That's why I'm 10:09:44

5 | objecting. No one can hear you. You sound like 10:09:44

6 | you are under water. So I don't know what sort of 10:09:45

```
7 |         professional --                                10:09:46
```

8 MR. GRUBMAN: I don't know what to do 10:09:48

9 | about that, Bruce. This is, again -- can you hear 10:09:51

10	me now?	10:09:52
----	---------	----------

11 MR. BROWN: I'm not going to take 10:09:53

12 responsibility for the quality of your microphone, 10:09:54

13 Mr. Grubman. If we can't hear you -- 10:09:56

14 MR. GRUBMAN: Bruce, it is your 10:09:59

15	deposition. Stop, Bruce, you are going to have to	10:10:00
----	---	----------

16 stop. This is your deposition. Your deposition. 10:10:02

17	Okay? Stop Bruce. Stop Bruce. Don't interrupt	10:10:04
----	---	----------

18	me again.	10:10:10
----	-----------	----------

19	I'm going to object on Mr. Brown's	10:10:11
----	------------------------------------	----------

20 last question. It assumes facts in evidence and 10:10:12

21 it was also testimony by counsel in the guise of a 10:10:17

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1 question. I will object. 10:10:20

2 If you have seen this document, 10:10:22

3 Mr. Voyles, you can testify to it. If you have 10:10:24

4 not I'm going to instruct you not to speculate and 10:10:27

5 just tell Mr. Brown you have never seen this 10:10:30

6 document before, which has not been shared with us 10:10:34

7 prior to this deposition. 10:10:36

8 Go ahead, Mr. Voyles, if you can. 10:10:38

9 THE WITNESS: What was the question? 10:10:40

10 MR. GRUBMAN: I didn't hear a 10:10:42

11 question. I heard testimony, so maybe Mr. Brown 10:10:44

12 could pose a question to you now. 10:10:47

13 What is your question, Mr. Brown? Do 10:10:51

14 you have one? 10:10:53

15 MR. BROWN: I do. 10:10:55

16 MR. GRUBMAN: Okay, ask it then. 10:10:56

17 BY MR. BROWN: 10:10:57

18 Q Do you recall going to the Coffee 10:10:58

19 County elections office on 11-16 at around 1:59 10:11:00

20 p.m.? 10:11:08

21 A I don't remember dates and times like 10:11:09

1       that, but I'm not saying I did or did not. I just       10:11:11  
2       don't remember that.       10:11:14

3               Q       That would not be inconsistent with       10:11:15  
4       your recollection, correct?       10:11:18

5               MR. GRUBMAN: Objection.       10:11:20

6               Mr. Voyles, if you don't remember it,       10:11:25  
7       just repeat that and Mr. Brown can ask you the       10:11:27  
8       same question over and over if you like.       10:11:30

9               Go ahead.       10:11:33

10              A       I don't remember.       10:11:34

11              Q       Here is the thing is that if you were,       10:11:36  
12       say, out of the country then you would say no.       10:11:38  
13       This is wrong. I could not have been there. So       10:11:43  
14       what I'm saying is that is this inconsistent with       10:11:46  
15       your recollection?       10:11:49

16              MR. GRUBMAN: Mr. Brown, he answered       10:11:51  
17       your question which is he doesn't remember.       10:11:53

18              You can now ask your next question.       10:11:56

19              Q       So if the video shows you arriving on       10:11:58  
20       November 16 at 1:59 p.m. --       10:12:00

21              MR. GRUBMAN: I will object again.       10:12:07

1 Mr. Voyles has answered twice now that he does not 10:12:09  
2 remember and Mr. Brown continues to reference 10:12:12  
3 evidence that has not been shared with us prior to 10:12:15  
4 this deposition and is not in evidence in this 10:12:19  
5 deposition. I would strongly suggest that if 10:12:21  
6 Mr. Brown has a video he would like to question 10:12:25  
7 Mr. Voyles on that Mr. Brown put up that video. 10:12:27  
8 Otherwise, the question has been answered. 10:12:31  
9 You can now move on to your next 10:12:33  
10 question, Mr. Brown. 10:12:36  
11 Q What were you doing in the elections 10:12:38  
12 office on November 16? 10:12:40  
13 A I do not remember. 10:12:42  
14 Q Going down on Exhibit 2 you will see 10:12:45  
15 that this shows a number of visits for many, many 10:12:54  
16 hours in the month of December. 10:12:58  
17 MR. GRUBMAN: Objection to the 10:13:03  
18 characterization of many, many hours. 10:13:04  
19 Is there a question on the table, 10:13:09  
20 Mr. Brown? 10:13:11  
21 MR. BROWN: I can't remember because 10:13:12

1           you objected right in the middle of it.           10:13:13

2                   MR. GRUBMAN: You paused. We got to           10:13:16

3           get this thing moving, Bruce. You were an hour           10:13:18

4           late so just trying to get it to move.           10:13:22

5                   MR. BROWN: Mr. Grubman, you are           10:13:26

6           making a record yourself. I am trying --           10:13:27

7                   MR. GRUBMAN: Yes, I am, because when           10:13:29

8           I file a motion for sanctions against you           10:13:30

9           personally, I want this record. So let's ask your           10:13:32

10          questions and move on so we are not wasting           10:13:37

11          Mr. Voyles' precious time as a nonparty in this           10:13:40

12          case.           10:13:44

13                  Q           Why did you spend so much time in the           10:13:44

14          Coffee County elections office in December of           10:13:46

15          2020?           10:13:48

16                  A           Talking to people.           10:13:52

17                  Q           About what?           10:13:55

18                  A           Whatever is in the text messages I           10:14:00

19          suppose.           10:14:04

20                  Q           Now, I'm talking about when you were           10:14:06

21          there in person. What were you talking -- what           10:14:08

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1 | were you doing there? | 10:14:12

2 MR. GRUBMAN: Mr. Brown, is there a 10:14:14

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3 | date that you are asking about or do you want him 10:14:15
```

4 to summarize every conversation he had for a 10:14:19

5 month? I am very confused by your line of 10:14:22

6 questioning. Are you asking about a date, a 10:14:25

7 particular conversation, or do you want Mr. Voyles 10:14:25

8 to summarize every conversation that he had in the 10:14:27

9 | month of December 2020? 10:14:31

10 MR. BROWN: I didn't even ask about 10:14:33

11 |       communications. I said what was he doing in       10:14:34

12	December in the Coffee County elections office,	10:14:37
----	---	----------

13	December 3, 4th, 7th, 8th, 9th, 10th, 14th and	10:14:42
----	--	----------

14	31st.	10:14:50
----	-------	----------

15	A	If I could remember every one of those	10:14:52
----	---	--	----------

16	things I could certainly tell you. I would tell	10:14:54
----	---	----------

17           you. I don't exactly remember what I was doing           10:14:59

18	there every day. I'm sure I was talking to	10:15:01
----	--	----------

19 people, asking questions, trying to figure out 10:15:04

20 what was going on in elections. I know there was 10:15:06

21       some -- there were things going on with the state       10:15:09

1       hearings about the elections. I was talking to       10:15:15  
2       people about those hearings. I don't know       10:15:19  
3       exactly.       10:15:28

4               Q       And so as a private citizen you were       10:15:32  
5       going to the elections office frequently to talk       10:15:36  
6       about how the election office was handling the       10:15:39  
7       2020 election, right?       10:15:44

8               MR. GRUBMAN: Objection,       10:15:46  
9       mischaracterizes testimony. Objection as to       10:15:46  
10       frequently and other testimony by counsel.       10:15:49

11               You may answer if you can, Mr. Voyles.       10:15:52

12               A       I don't know.       10:16:02

13               Q       So in December of 2020 after the       10:16:03  
14       general election, isn't it true that you made       10:16:05  
15       frequent visits, some for as long as three hours,       10:16:11  
16       to the Coffee County election office to talk about       10:16:20  
17       the election?       10:16:24

18               MR. GRUBMAN: Objection to the       10:16:25  
19       characterization of Mr. Voyles' visits being       10:16:26  
20       frequent. I would ask opposing counsel to tone       10:16:28  
21       down his testimony.       10:16:32

1                   You can answer if you can, Mr. Voyles.           10:16:33

2           A        If the video shows that I was there,           10:16:39

3       then I would have been there. I haven't seen the       10:16:42

4       videos. I don't know.                                   10:16:45

5           Q        Do you recall being there for extended       10:16:47

6       periods of time throughout December?                   10:16:49

7           A        I do recall being there a good number       10:16:51

8       of times, yes, sir.                                   10:16:54

9           Q        Thank you.                                   10:16:55

10                   Let me take you back to the November       10:17:12

11       2020 general election. Coffee County didn't have       10:17:14

12       any trouble counting the votes initially with the       10:17:21

13       2020 general election, right?                           10:17:25

14           A        Are you telling me that?                   10:17:36

15           Q        I'm asking. I'm asking you.               10:17:37

16           A        I suppose you are correct. I don't           10:17:41

17       know.   10:17:42

18           Q        Do you recall any trouble that Coffee       10:17:44

19       County had with the original count of the 2020           10:17:45

20       general election?                                   10:17:50

21           A        I don't think I was there on election       10:18:01

1 night to know. I could have been but I don't 10:18:03

2 think I was. 10:18:05

3 Q Fair enough. 10:18:06

4 Do you recall that Coffee County had 10:18:08

5 to do a hand count or an audit of the general 10:18:10

6 election? 10:18:18

7 A I know there was a recount, yes. 10:18:18

8 Q And there were two, depending on how 10:18:23

9 you count it, but one was by hand; is that right? 10:18:25

10 A I believe that's correct. 10:18:29

11 Q To the best of your recollection, did 10:18:30

12 the hand count match the original election 10:18:32

13 results? 10:18:37

14 A Geez, I don't remember but I don't 10:18:40

15 think it did. I wasn't positive about that. 10:18:43

16 Q Do you recall it being just one vote 10:18:56

17 off? 10:18:57

18 A I mean that very well could be 10:19:04

19 correct. It very well could be. 10:19:07

20 MR. BROWN: I'm going to mark as 10:19:14

21 Exhibit 3 Tab 14. 10:19:16

1 (Voyles Deposition Exhibit No. 3 was 10:19:18  
2 marked for identification.) 10:19:18  
3 BY MR. BROWN: 10:19:33  
4 Q Do you have that in front of you, sir? 10:19:33  
5 MR. GRUBMAN: We do not. All we see 10:19:37  
6 in front of us is Exhibit 1 and Exhibit 2. 10:19:39  
7 Okay, now, it's showing up. All 10:19:44  
8 right, he can see it. 10:19:53  
9 BY MR. BROWN: 10:19:59  
10 Q Mr. Voyles, Exhibit 3 is entitled 10:20:00  
11 Coffee County Board of Elections and Registration 10:20:03  
12 Monthly Board Meeting November 10, 2020. 10:20:06  
13 Do you see that? 10:20:08  
14 A Yes, sir. 10:20:09  
15 Q And do you see down a couple of lines 10:20:10  
16 that you were a guest? 10:20:12  
17 A Yes, sir. 10:20:13  
18 Q And what was your role in that 10:20:14  
19 meeting, if any, if you recall? 10:20:22  
20 A Give me a moment to read the minutes 10:20:29  
21 here. 10:20:31

1           Q       You are free to read the whole thing,       10:20:38  
2       and I encourage you to if you like. I would also,       10:20:40  
3       in sensitivity to Mr. Grubman's time and expense,       10:20:43  
4       direct your attention to Paragraph 10 on Page 2 of       10:20:52  
5       Exhibit 3.       10:21:00

6           A       Okay.       10:21:08

7           Q       And do you see where you suggested or,       10:21:08  
8       I'm sorry, Ms. Martin suggested that you draft a       10:21:12  
9       letter to Secretary Raffensperger expressing the       10:21:16  
10       concerns of the board with the system?       10:21:25

11          A       Yes, sir.       10:21:27

12          Q       And do you recall, sitting here today,       10:21:29  
13       what those concerns were? And this is just a,       10:21:30  
14       pretty sure this is November 10, 2020. What were       10:21:35  
15       the concerns at that time that the board had with       10:21:43  
16       the Dominion system?       10:21:46

17          A       I am sure we could look at the letter,       10:21:48  
18       but as I recall there were, during what I think       10:21:50  
19       they called the adjudication process now, if       10:21:55  
20       you're not actually able to view the computer       10:21:59  
21       screen you can't tell exactly what is being       10:22:03

1 changed with the votes. I think I recall you 10:22:06  
2 being able to change a bunch of votes. I can't 10:22:12  
3 remember what the other issues were. I'm sure we 10:22:19  
4 could look at the letter and it would outline them 10:22:22  
5 because I did the following day, I think it was 10:22:25  
6 the following day, go in and draft a letter. And 10:22:27  
7 I think I did it pen and paper and left it for 10:22:33  
8 them to make their own, and then approve it at the 10:22:38  
9 next meeting, a called meeting. 10:22:44

10 Q Was the -- you mentioned a problem 10:22:53  
11 with the adjudication. Can you explain for the 10:22:57  
12 record what your understanding of adjudication 10:23:00  
13 means in this context? 10:23:05

14 A So I'm more familiar with the older 10:23:06  
15 Diebold system than I am this system. But from 10:23:08  
16 what I understood, if there are stray marks on the 10:23:12  
17 papers or if I had voted for two people in the 10:23:20  
18 same race, then that ballot would have to be 10:23:27  
19 adjudicated. The old system, it would have been 10:23:32  
20 done by hand with a representative from each party 10:23:39  
21 and a board member, and they would have then voted 10:23:44

1 the intent of the voter as those three could 10:23:50  
2 determine on a new ballot. So if I'm correct, and 10:23:55  
3 I may not be, I think that's what was going on 10:23:59  
4 here. But on the ones that are run through the 10:24:01  
5 machinery. 10:24:04

6 Q The county did not have any specific 10:24:09  
7 problems with its own election related to the 10:24:14  
8 adjudication, did it? 10:24:19

9 A I'm not sure I understand the 10:24:21  
10 question. 10:24:23

11 Q Well, you express the view, which is 10:24:23  
12 explained about the functioning of the system, 10:24:28  
13 but, to your knowledge, did that have any impact 10:24:33  
14 upon the accuracy of Coffee County's votes for the 10:24:36  
15 2020 election? 10:24:42

16 A I don't really know but I don't think 10:24:43  
17 so. I don't know that for sure. I think these 10:24:45  
18 were things that they discovered during the 10:24:52  
19 election when they were going through the 10:24:56  
20 processing. Do you have the letter also? 10:25:01

21 Q Yes. I'm going to show that to you in 10:25:05

1 a second when I get the number. 10:25:08

2 Did Ms. Martin, who is Ms. Hampton, 10:25:12

3 right? Misty Martin, Ms. Hampton, same person, 10:25:16

4 correct? 10:25:20

5 A Yes. 10:25:21

6 Q Did she -- 10:25:21

7 A I didn't remember if it was her or if 10:25:22

8 it was Mr. Wendell Stone who had made the motion. 10:25:24

9 I don't remember. For some reason, in the back of 10:25:29

10 my head I thought it might have been him. But the 10:25:31

11 minutes are there, so ... 10:25:35

12 Q Did Ms. Hampton make a video that 10:25:38

13 described the adjudication issue that you are 10:25:42

14 explaining? 10:25:45

15 A Yes. Someone did. I can't remember 10:25:47

16 exactly who did. I know -- so, as I said, I wrote 10:25:49

17 out the letter for them to tweak and make their 10:25:57

18 own at their request. Then there was a called 10:26:02

19 board meeting I suppose the following day, and at 10:26:07

20 that called meeting during the review of the 10:26:13

21 letter -- I was actually present sitting there -- 10:26:17

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1       they started discussing at the board and said,       10:26:21  
2       someone said we need to be sure about every one of       10:26:26  
3       these things before we send this letter. And so       10:26:30  
4       if my recollection is correct, they decided to do       10:26:35  
5       a short mock election to verify, and at that point       10:26:43  
6       someone was videoing the processes that they were       10:26:51  
7       going through.       10:26:58  
8               MR. BROWN: We will mark as Exhibit 4       10:27:07  
9       Tab 43.       10:27:09  
10               (Voyles Deposition Exhibit No. 4 was       10:27:11  
11       marked for identification.)       10:27:11  
12       BY MR. BROWN:       10:27:31  
13               Q       And if you turn to Page 28 --       10:27:31  
14               MR. GRUBMAN: Hold on. It hasn't come       10:27:35  
15       up on our screen yet.       10:27:36  
16               It is on his screen.       10:27:51  
17               A       What am I looking for?       10:27:53  
18               Q       You are looking for, I believe it is       10:27:54  
19       Exhibit 7 in that pdf. It should be on about the       10:27:55  
20       28th page of that pdf.       10:28:01  
21               MR. GRUBMAN: All right, we are there.       10:28:18



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1	(Voyles Deposition Exhibit No. 5 was	10:30:18
2	marked for identification.)	10:30:18
3	BY MR. BROWN:	10:30:20
4	Q Okay.	10:30:21
5	Do you see the first page of Exhibit 4	10:30:21
6	is from Misty Hampton to you, or is that your	10:30:24
7	wife?	10:30:28
8	A The E is me, Blake Edward.	10:30:29
9	Q And do you see where she says, "I air	10:30:33
10	dropped the video to Ed Voyles."	10:30:36
11	Do you see that?	10:30:39
12	A Correct.	10:30:40
13	Q Do you recall Ms. Hampton air dropping	10:30:41
14	the video of the board meeting to you?	10:30:44
15	A Yes.	10:30:49
16	Q And did you ask her to do that?	10:30:52
17	A I had filed an open records request	10:30:54
18	for that video.	10:30:58
19	Q And why did you submit an open records	10:31:02
20	request for that video?	10:31:07
21	A To see it and review it.	10:31:09

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1 Q And what did you -- what did you do 10:31:13  
2 with it? Did you send it out to other people? 10:31:15

3 A I'm quite sure I did. Who, I could 10:31:18  
4 not even begin to tell you at this point. 10:31:24

5 Q Let me direct your attention to the 10:31:29  
6 second page of Exhibit 4. 10:31:39

7 THE REPORTER: Excuse me, Mr. Brown. 10:31:42  
8 I believe that's Exhibit 5. 10:31:44

9 MR. BROWN: Sorry, Mr. Grubman. Bear 10:31:49  
10 with me. 10:31:51

11 THE WITNESS: It says Exhibit 5 there. 10:31:55

12 MR. BROWN: What was Exhibit 4? 10:31:57

13 MR. GRUBMAN: A 39-page document 10:32:11  
14 titled letter to Blackmon. 10:32:12

15 MR. BROWN: Sorry about that. 10:32:15

16 BY MR. BROWN: 10:32:28

17 Q I apologize, Mr. Voyles. 10:32:28

18 Exhibit 5 is the -- the first page of 10:32:30

19 Exhibit 5 is the e-mail from Missy Hampton to you 10:32:35

20 dated November 16th. The second page of that 10:32:39

21 exhibit, do you see that? 10:32:42

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1	A	Yes.	10:32:50
---	---	------	----------

2	Q	And do you see that that is an e-mail	10:32:50
---	---	---------------------------------------	----------

3 | from Georgia EDO, donalddtrump.com to Ms. Hampton 10:32:54

4 in which Mr. Sinners asked for the audio of the 10:33:05

5	November 10 meeting?	10:33:09
---	----------------------	----------

6	A	I do see that.	10:33:12
---	---	----------------	----------

7	Q	And was Mr. Sinners' request for the	10:33:15
---	---	--------------------------------------	----------

8	audio related to your request for the audio?	10:33:18
---	--	----------

9 MR. GRUBMAN: Objection, calls for 10:33:23

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10 | speculation.                                     10:33:23
```

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11      A      I have no idea.                                10:33:26
```

12 MR. GRUBMAN: Talk up a little bit so 10:33:30

13	they can hear you.	10:33:31
----	--------------------	----------

14	A	I have no idea about that. I would	10:33:33
----	---	------------------------------------	----------

15	not know.	10:33:35
----	-----------	----------

16	Q	Were you asked by the Donald Trump for	10:33:36
----	---	--	----------

17	President to obtain the video of the meeting?	10:33:40
----	---	----------

18	A	No, sir.	10:33:43
----	---	----------	----------

19 Q And you don't recall what you did with 10:33:45

20	the video?	10:33:47
----	------------	----------

21	A	I'm pretty sure I sent a copy. I	10:33:52
----	---	----------------------------------	----------

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1 would have to go back and figure out but I may 10:33:55

2 have sent one to VoterGA. 10:33:58

3 Q To who? 10:34:02

4 A There is a guy in Atlanta, and I think 10:34:04

5 the name of his company was VoterGA -- what is his 10:34:06

6 name? Oh, Garland Favorito. I very well probably 10:34:12

7 sent it to him. 10:34:22

8 Q And why did you do that? 10:34:24

9 A I don't recall. I'm sure we were 10:34:31

10 having discussions if I did send it to him. 10:34:34

11 Q Were your discussions about the 10:34:38

12 Dominion system generally? 10:34:40

13 A Generally I would think they were 10:34:43

14 about the election and the system, yes. 10:34:44

15 Q And was he involved in a lawsuit about 10:34:49

16 the Dominion system at that time or did that come 10:34:53

17 later? 10:34:57

18 A I don't know the answer to that 10:34:58

19 question. I'm not sure. 10:34:59

20 Q Did Mr. Favorito contact you to get 10:35:01

21 the video or did you contact him? 10:35:04

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1 A I don't recall. 10:35:09

2 Q When you did first speak with -- 10:35:12

3 A I really don't even remember how I 10:35:15

4 ended up initially contacting him or talking to 10:35:17

5 him. I can't recall how that occurred. 10:35:26

6 Q You don't know what the connection was 10:35:28

7 between you and him? 10:35:30

8 A I really don't. There may have been 10:35:31

9 others I sent the video to also. I don't know. I 10:35:33

10 would have to figure out how to find that out. 10:35:37

11 Q Is it fair to say -- well, let me back 10:35:40

12 up a second. Strike that. 10:35:42

13 You were concerned about the 10:35:45

14 reliability of the Dominion system at this time, 10:35:47

15 correct? 10:35:52

16 A Of the issues that were in the letter. 10:35:54

17 Q And you are referring to your November 10:35:59

18 11 letter? 10:36:02

19 A Yes, sir. 10:36:03

20 Q Did you have a concern about the 10:36:13

21 accuracy of the votes or simply as a general 10:36:15

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1 matter the quality and the security and the 10:36:19

2 reliability of the Dominion system, or both? 10:36:23

3 A Would you repeat that, please, so I 10:36:27

4 could -- 10:36:28

5 Q Let me back up and try to do a better 10:36:29

6 job with that. 10:36:31

7 A Okay. 10:36:33

8 Q This is November 2020. Okay? 10:36:34

9 A Okay. 10:36:37

10 Q The issues with Dominion predated the 10:36:38

11 2020 election, correct? Did you have problems 10:36:42

12 with the Dominion system prior to the 2020 10:36:45

13 election? 10:36:49

14 A Personally I never used the Dominion 10:36:49

15 system. I was only on the board during the use of 10:36:53

16 the Diebold system. 10:36:56

17 Q Okay. In this time frame were your 10:36:59

18 concerns about the Dominion system related to the 10:37:02

19 accuracy of the 2020 election specifically or was 10:37:06

20 it a general problem with how the Dominion system 10:37:08

21 worked? 10:37:12

1           A       My concerns were with, at that point       10:37:14

2       in time were with what I put in the letter.       10:37:16

3       That's what I knew.       10:37:19

4           Q       After -- do you recall any follow-up       10:37:27

5       with Mr. Favorito about the board meeting minutes       10:37:30

6       or video?       10:37:36

7           A       I don't -- I don't remember. There       10:37:39

8       could have been but I just don't remember. It's       10:37:40

9       quite a while ago to try to remember everything       10:37:52

10      like that.       10:37:55

11          Q       I understand.       10:37:55

12               And so your testimony is, and I just       10:37:58

13      need to be sure, but you do not recall any       10:38:00

14      communications, texts, e-mail with Robert Sinners;       10:38:02

15      is that correct?       10:38:10

16          A       No, sir, I don't. And I searched my       10:38:11

17      phone to see if there had been and I found none.       10:38:14

18               MR. BROWN: Let me mark Tab 23 as       10:39:07

19      Exhibit 6.       10:39:10

20               (Voyles Deposition Exhibit No. 6 was       10:39:11

21      marked for identification.)       10:39:11

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1 BY MR. BROWN: 10:39:36

2 Q Do you have that in front of you? 10:39:37

3 MR. GRUBMAN: Yes, we have it now. 10:39:43

4 Q If you scroll down to the second page 10:39:45

5 and following you will see that this appears to be 10:39:48

6 draft executive orders for President Trump. Have 10:39:52

7 you seen these before? 10:39:57

8 A I don't know that I have. 10:40:09

9 Q Did you know that Coffee County had 10:40:12

10 been featured in a draft executive order that was 10:40:16

11 presented to the president? 10:40:20

12 A I didn't. I don't think that I did. 10:40:23

13 I don't recall that. If I did know it, I sure 10:40:27

14 don't remember it. 10:40:30

15 Q And do you recall who, if anybody, 10:40:31

16 from Coffee County was involved in presenting to 10:40:33

17 the president an executive order that mentioned 10:40:39

18 Coffee County? 10:40:46

19 A I do not. 10:40:46

20 Q Do you recall a hearing in connection 10:40:55

21 with Coffee County's certification of the result, 10:40:57

1           that the fact that Coffee County was having           10:41:01

2           difficulty certifying its result was presented to       10:41:07

3           the president?           10:41:11

4           A           Could you repeat that once more?       10:41:14

5           Q           Did you know anything about any       10:41:16

6           information given to President Trump about Coffee   10:41:18

7           County's difficulty in certifying the results?       10:41:21

8           A           No, I did not, and I don't know how it   10:41:25

9           would have gotten there. I wasn't involved in       10:41:27

10          anything like that.           10:41:30

11          Q           Do you know Cathy Latham?           10:41:35

12          A           Yes, sir, I do.           10:41:38

13          Q           And who is she?           10:41:40

14          A           Cathy has been in Douglas for quite a   10:41:42

15          number of years. She worked at the high school as   10:41:45

16          a teacher and I know she was a member of the GOP.   10:41:48

17          Q           I believe this was probably covered by   10:42:04

18          a prior question, but do you have any reason to   10:42:07

19          believe that she was involved in getting Coffee   10:42:10

20          County's name in front of the president in the       10:42:12

21          form of draft executive orders?           10:42:15

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1           A       I don't know if she had anything to do   10:42:18  
2       with that or not.                                   10:42:21

3                   MR. BROWN:   If we could mark as           10:42:49  
4       Exhibit 7, Tab 9.                                   10:42:51

5                   (Voyles Deposition Exhibit No. 7 was       10:42:53  
6       marked for identification.)                       10:42:53

7       BY MR. BROWN:                                   10:43:22

8           Q       Do you have that in front of you?       10:43:23

9           A       Yes.                                   10:43:25

10          Q       And you see that this is a December 21   10:43:28  
11       e-mail to you?                                   10:43:31

12          A       Yes, I do see that, from Marilyn       10:43:40  
13       Marks.   10:43:43

14          Q       And when is the first time that you --   10:43:50  
15       is this the first time you saw the lawsuit that       10:43:53  
16       was brought by Shawn Still?                       10:43:56

17          A       I suppose it would have been.           10:44:00

18          Q       And did you know anything about the       10:44:05  
19       filing of that suit before it was filed, that it       10:44:06  
20       was coming?                                       10:44:09

21          A       That it was coming?                   10:44:11

1 Q Yes, that they were going to sue you. 10:44:13

2 A That they were going to sue me? 10:44:17

3 Q No, not you but Coffee County. 10:44:19

4 A Oh. Oh. I don't know that I did. 10:44:22

5 Q And do you recall sending a copy of 10:44:30

6 that lawsuit to Marilyn Marks first, before this 10:44:32

7 e-mail? 10:44:36

8 A I don't recall that. Did I or could I 10:44:46

9 have? It would have been in my e-mail or text 10:44:49

10 messages if I had. 10:44:53

11 Q And do you recall how you got a copy 10:45:01

12 of this lawsuit that wasn't stamp filed? This one 10:45:02

13 doesn't have a stamp file on it, Exhibit 7. 10:45:07

14 Do you see that, Page 2? 10:45:10

15 A What does that mean, stamp file? 10:45:13

16 MR. GRUBMAN: He doesn't understand 10:45:15

17 what you mean by stamp file. 10:45:17

18 Q If you look at this lawsuit there is 10:45:19

19 no indication at the top that it has been filed 10:45:21

20 with the court. Do you recall getting, like, an 10:45:24

21 early copy of the lawsuit before it was filed? 10:45:30

1           A       Honestly I don't remember, and if I       10:45:37  
2       did I don't remember how I would have.       10:45:40

3           Q       Did you know prior to December 21st       10:45:54  
4       that Shawn Still and others were planning on suing       10:46:00  
5       Coffee County over the 2020 election?       10:46:06

6           A       I don't recall. I mean, I certainly       10:46:12  
7       don't -- I certainly don't remember if I knew it       10:46:15  
8       or not.       10:46:18

9           Q       Did you talk to Tony Rowell about the       10:46:29  
10       lawsuit?       10:46:33

11          A       If I did I would have more than likely       10:46:34  
12       sent a text to him or he would have sent to me.       10:46:36

13          Q       Apart from the written record you       10:46:42  
14       don't recall speaking to him?       10:46:44

15          A       I don't remember. I'm not saying that       10:46:47  
16       we didn't. I'm just saying that I don't remember.       10:46:50

17          Q       Do you recall speaking to anybody       10:47:14  
18       about a lawsuit being filed against Coffee County       10:47:16  
19       relating to the 2020 election?       10:47:19

20          A       I don't have a recollection of it. I       10:47:28  
21       mean, could I have? I very well could have if I       10:47:30

1 had known about it, but I just don't remember. 10:47:33

2 Q Do you recall Eric Chaney collecting 10:47:38

3 affidavits from voters in Coffee County that were 10:47:46

4 used in the lawsuit against Coffee County? 10:47:51

5 A I don't. 10:47:54

6 Q Do you recall anybody on the board or 10:47:58

7 you giving any information to the plaintiffs or 10:47:59

8 the plaintiffs' lawyers relating to this lawsuit? 10:48:05

9 A And the plaintiffs' lawyers are? 10:48:17

10 Q Kurt Hilburt. 10:48:19

11 A I don't see that. 10:48:21

12 Q I'm telling you that is who it is. 10:48:23

13 Did you give any information to Kurt Hilburt? 10:48:25

14 A I don't know that name so I would 10:48:29

15 say -- I would say no. I certainly don't recall 10:48:31

16 doing anything like that. 10:48:36

17 Q You wouldn't give information to 10:48:38

18 people that were fixing to sue Coffee County, 10:48:40

19 would you? 10:48:43

20 A I can't imagine why I would. 10:48:45

21 Q And you don't remember doing so, do 10:48:48

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1	you?	10:48:50
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2	A	I don't think I did.	10:48:51
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3	MR. BROWN: Let me mark as the next	10:49:09
4	exhibit Tab 13.	10:49:11

5	(Voyles Deposition Exhibit No. 8 was	10:49:19
6	marked for identification.)	10:49:19

7	MR. BROWN: I believe that's	10:49:27
8	Exhibit 8, Ms. Hallock.	10:49:28

9 MR. GRUBMAN: All right, we got it. 10:49:48

10	BY MR. BROWN:	10:49:51
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11	Q	Mr. Voyles, just in your own words, do	10:49:51
12		you recall what was going on with the	10:49:54

13	certification of the 2020 election in Coffee	10:49:55
----	--	----------

14	County?	10:49:59
----	---------	----------

15	A	I know the recount, the machine	10:50:06
----	---	---------------------------------	----------

16 recount didn't match election night. And I 10:50:13

17	remember in discussions with board members and	10:50:25
----	--	----------

18 maybe even the attorney, Tony Rowell, how do you 10:50:28

19 certify a different number, how do you certify two 10:50:32

20	numbers?	10:50:39
----	----------	----------

21	You certify election night numbers,	10:50:40
----	-------------------------------------	----------

1 right, and then how do you certify another number. 10:50:44

2 I remember that. And I remember -- I remember 10:50:48

3 being in the office with Mr. Rowell looking at 10:50:56

4 those numbers and kind of working up some type of 10:51:07

5 spreadsheet or something for those numbers. 10:51:12

6 Q And this was -- I'm not suggesting 10:51:16

7 anything wrong with it but this was in your 10:51:20

8 capacity as a private citizen, correct? 10:51:22

9 A That is correct. 10:51:26

10 Q And do you recall -- 10:51:27

11 A I was not on the board anywhere at 10:51:29

12 this point in time. 10:51:32

13 Q And looking at Exhibit 8, do you 10:51:34

14 recall that press release being issued by 10:51:37

15 Mr. Harvey? 10:51:40

16 A I have not seen this press release 10:51:43

17 that I'm aware of. I have certainly not seen it 10:51:46

18 on the letterhead or anything like this. 10:51:49

19 Q Do you recall Chris Harvey or someone 10:51:52

20 from the Secretary of State calling Ms. Hampton in 10:51:54

21 the election office urging her to complete the 10:51:58

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1 recount and certification as soon as possible? 10:52:03

2 MS. LaROSS: Object to the form of the 10:52:10

3 question. 10:52:11

4 This is Diane LaRoss. 10:52:11

5 Q Go ahead. 10:52:16

6 A So you rephrase the question or 10:52:21

7 what -- 10:52:22

8 MR. GRUBMAN: These are just 10:52:23

9 objections for the record, so unless I instruct 10:52:24

10 you not to answer you can answer to the best of 10:52:26

11 your ability. 10:52:29

12 THE WITNESS: Okay. 10:52:31

13 A I remember being told, and I'm not 10:52:32

14 sure if it was Misty or others, board members or 10:52:35

15 Mr. Rowell, but I remember being told that they 10:52:40

16 were receiving pressure to go ahead and certify. 10:52:44

17 And once again, I mean, I said exactly what I did. 10:52:47

18 How do you certify two different numbers and they 10:52:53

19 both be correct? So that was a big discussion 10:52:56

20 that was going on, and while I was there -- I know 10:52:59

21 I was there, I know Mr. Rowell was there. I can't 10:53:02

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1 remember who all else, but -- 10:53:05

2 Q And you're saying there. You were 10:53:12

3 there in the election office, right? 10:53:15

4 A Yes, sir. Yes, sir. 10:53:18

5 Q And what was being done by the Coffee 10:53:19

6 County to try to certify the election? What were 10:53:21

7 they actually doing? Were they recounting or 10:53:24

8 running the machines again? What were they doing? 10:53:28

9 A I think they actually did count 10:53:32

10 multiple times trying to figure out what the 10:53:33

11 issues were. I think that's correct. 10:53:36

12 Q Trying to get a repeatable -- 10:53:39

13 A It probably shows on the spreadsheet 10:53:42

14 if there were more than one count because I 10:53:47

15 remember -- I don't know, I just remember the 10:53:49

16 spreadsheet and the numbers. I don't remember the 10:53:52

17 numbers but I remember sitting there with Tony and 10:53:54

18 looking at it and putting together a spreadsheet. 10:53:58

19 Q And the spreadsheet shows the 10:54:03

20 different outcomes of the various counts; is that 10:54:04

21 right? 10:54:08

1           A       Yes. That's the way I recall it in my   10:54:09  
2       mind's eye.   10:54:12

3           Q       Do you know why Coffee County just   10:54:24  
4       didn't at that time count everything by hand to   10:54:26  
5       certify it, 15,000 votes?                       10:54:31

6           A       I don't.                               10:54:36

7           Q       Were you aware of any efforts to try   10:54:38  
8       to slow down the certification of Coffee County's   10:54:41  
9       election results?                               10:54:45

10          A       By whom?                               10:54:47

11          Q       By anybody.                           10:54:48

12          A       No.                                   10:54:50

13          Q       Did you have any communications with   10:54:54  
14       anybody about efforts to slow down the           10:54:56  
15       certification?                               10:55:03

16          A       No, sir. I don't understand why you   10:55:05  
17       would so ...                                   10:55:07

18          Q       Well, one reason would be if you were   10:55:10  
19       trying to buy time to challenge the election       10:55:12  
20       results, right?                               10:55:17

21               MR. GRUBMAN: Mr. Voyles, don't ask       10:55:22

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1 him questions, answer his questions. 10:55:23

2 MR. BROWN: I don't know what that 10:55:27

3 was. I guess that was an objection. 10:55:28

4 MR. GRUBMAN: That was an instruction 10:55:31

5 to my client who is sitting there. So you can ask 10:55:32

6 the next question. 10:55:38

7 MR. BROWN: Can you repeat the 10:55:40

8 question, court reporter? 10:55:41

9 (The record was read as requested.) 10:55:58

10 MR. GRUBMAN: Objection. Badgering 10:55:59

11 the witness. 10:56:02

12 Q Mr. Voyles, do you feel badgered? 10:56:06

13 MR. GRUBMAN: Don't answer that 10:56:08

14 question. 10:56:09

15 You can ask the next question, 10:56:10

16 Mr. Brown. You can stop laughing, too. This is a 10:56:12

17 very serious matter and we take it very seriously 10:56:16

18 and Mr. Voyles takes it very seriously. 10:56:19

19 Apparently you don't take it very seriously. But 10:56:21

20 I would ask you to stop laughing, stop badgering 10:56:24

21 the witness. And I would ask you to continue to 10:56:28

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1 ask your questions until the conclusion of this 10:56:30  
2 deposition. 10:56:32

3 This isn't a friendly conversation, 10:56:33  
4 Mr. Brown, based on how you have acted since the 10:56:36  
5 moment you sent those subpoenas. This isn't 10:56:39  
6 something we are going to pal around with you. 10:56:41  
7 That's not why we are here. Ask your questions. 10:56:44  
8 Mr. Voyles is going to answer to the best of his 10:56:47  
9 ability and we will go home. 10:56:47

10 MR. BROWN: Do you have any other 10:56:48  
11 self-serving rubbish to put on the record? 10:56:50

12 MR. GRUBMAN: You can ask a question 10:56:54  
13 to Mr. Voyles or we can go ahead and end this 10:56:55  
14 deposition. You can explain to Judge Totenberg 10:56:58  
15 why you think this behavior is appropriate. Up to 10:57:04  
16 you. I'm totally good with either one, Bruce. 10:57:07

17 MR. BROWN: I am, too. 10:57:10

18 MR. GRUBMAN: Okay, well, let's do 10:57:11  
19 that then. If you don't want to continue asking 10:57:11  
20 questions, if you would rather call Judge 10:57:11  
21 Totenberg, happy to. 10:57:14

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1 BY MR. BROWN: 10:57:18

2 Q Mr. Voyles, I asked you a question 10:57:19

3 about whether you knew anything about any delay 10:57:20

4 and you asked me why would anybody want a delay. 10:57:23

5 Then I said one reason -- 10:57:27

6 A I did not know anything about a delay. 10:57:29

7 Q One way or the other, right? 10:57:32

8 A I do not. 10:57:34

9 Q Thank you. 10:57:38

10 A Yes, sir. 10:57:40

11 MR. GRUBMAN: And Mr. Brown's 10:57:43

12 objection to me instructing my client, I would 10:57:45

13 once again instruct my client not to ask Mr. Brown 10:57:47

14 questions, to answer questions unless I tell you 10:57:51

15 not to. 10:57:54

16 MR. BROWN: Mr. Voyles, I do not 10:57:56

17 disagree with those instructions. Those are 10:57:57

18 totally appropriate. 10:58:00

19 And thank you, Scott, for that 10:58:02

20 injunction. 10:58:04

21

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1 BY MR. BROWN: 10:58:08

2 Q Mr. Voyles, in the November 3rd to 10:58:09

3 January 7 time frame -- November 3rd is the 10:58:11

4 election date, January 7 is the day that the 10:58:15

5 people came from Sullivan|Strickler and copied the 10:58:19

6 election equipment -- during that time frame did 10:58:24

7 you communicate with Sydney Powell? 10:58:26

8 A No, sir. 10:58:30

9 Q Did you communicate during that time 10:58:31

10 frame with Rudy Giuliani? 10:58:34

11 A No, sir. 10:58:37

12 Q Did you communicate at that time frame 10:58:37

13 with Dave Shaffer? 10:58:39

14 A No, sir. 10:58:43

15 Q Do you know David Shaffer? 10:58:44

16 A I do not know him. I know who he is. 10:58:46

17 He has held different positions, elected 10:58:49

18 positions, I think. And I believe he was chair of 10:58:51

19 the Republican party or some role in the 10:58:54

20 Republican party. 10:58:57

21 Q But you do not recall communicating 10:58:59

1	with him between November 3rd and January 7th,	10:59:01
2	correct?	10:59:05
3	A I do not.	10:59:05
4	Q Do you recall communicating with a	10:59:09
5	gentleman named Scott Hall during that time frame?	10:59:10
6	A I do not. I know the name.	10:59:14
7	Q How do you know the name?	10:59:16
8	A I've heard it.	10:59:19
9	Q And what did you hear about him?	10:59:21
10	A That he was a bail bondsman.	10:59:24
11	Q And what else?	10:59:28
12	A They were to come and meet with Misty.	10:59:35
13	Q And who told you that?	10:59:39
14	A I think it was Misty.	10:59:40
15	Q When did she tell you that?	10:59:43
16	A Oh, jeez. I don't know.	10:59:45
17	Q Was it before he did?	10:59:48
18	A I expect it was.	10:59:50
19	Q And so let me fast forward to January	10:59:53
20	7th.	11:00:03
21	Were you in the elections office on	11:00:04

1 January 7 when people came to the elections office 11:00:07

2 to make copies of the election software? 11:00:13

3 A I went to the office at some point 11:00:23

4 during that time. I may have gone and left and 11:00:26

5 gone back. I don't know for sure. I haven't seen 11:00:29

6 the videos to know. 11:00:32

7 Q Well, you were there. I'm not asking 11:00:36

8 about what you saw on the videos. 11:00:38

9 Do you recall being there? You do, 11:00:40

10 right? 11:00:44

11 A Yes. I went in the office during that 11:00:44

12 time frame, some time during that time frame. 11:00:47

13 Q Let me refer you back to Exhibit 2. 11:00:59

14 A Okay. 11:01:13

15 Q And if you would turn to the second 11:01:13

16 page of Exhibit 2 and look at the rows for January 11:01:15

17 7th. Are you with me? 11:01:18

18 MR. GRUBMAN: I'm going to say, you 11:01:24

19 are showing this document that I guess you made by 11:01:25

20 looking at the video. What are you asking him to 11:01:31

21 do? This is a highly objectionable document that 11:01:35

1 he knows nothing about. You keep showing it to 11:01:39  
2 him as though it means that he was there this day. 11:01:42  
3 Where does this come from, Bruce? You need to 11:01:46  
4 give context before you ask about it. Is this 11:01:49  
5 something that you created based on your review of 11:01:51  
6 a surveillance video? 11:01:56  
7 MR. BROWN: Yes. Not me personally 11:02:00  
8 but our team did, yes. 11:02:00  
9 MR. GRUBMAN: Well, I will instruct 11:02:00  
10 Mr. Voyles this does not mean that this is 11:02:01  
11 accurate. 11:02:04  
12 This is a document that him and his 11:02:04  
13 team made. If you can answer questions about this 11:02:07  
14 document you have never seen before, be my guest. 11:02:09  
15 Otherwise, feel free to explain to Mr. Brown that 11:02:12  
16 you have never seen this document. 11:02:15  
17 I don't understand why you think you 11:02:18  
18 can create notes about a video that you or your 11:02:19  
19 team apparently looked at and believe you have 11:02:23  
20 identified the exact times that Mr. Voyles has 11:02:25  
21 come and gone and then use it as though it is some 11:02:29

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1 sort of authority on where he was. 11:02:33

2 I mean, this would never -- this would 11:02:35

3 never be admissible in court so I can't imagine 11:02:39

4 why it would be admissible in a deposition. But 11:02:43

5 if you want to ask him questions about it I assume 11:02:47

6 his answer will be that he has never seen this 11:02:49

7 document before and he can't speak to it. 11:02:52

8 BY MR. BROWN: 11:02:55

9 Q Mr. Voyles, I would never ask you if 11:02:55

10 you have seen this document because that would be 11:02:57

11 silly because we prepared it for this deposition 11:03:00

12 to aid your testimony. Do you not assume it's 11:03:09

13 correct? Are you with me? Scott, you got 11:03:10

14 anything else? 11:03:11

15 MR. GRUBMAN: I mean you are putting 11:03:12

16 up a document and now you are saying don't assume 11:03:13

17 it is correct. 11:03:16

18 MR. BROWN: I do it all the time. I 11:03:18

19 do it all the time. So do you. 11:03:19

20 MR. GRUBMAN: I don't, Bruce. 11:03:22

21 Actually, I don't. I don't know what they teach 11:03:23

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1       you, you used to clerk down on the Supreme Court.       11:03:24

2       I certainly wasn't there, but in trial law this       11:03:27

3       would never be an admissible document unless you       11:03:29

4       were friends with the judge. This isn't something       11:03:33

5       I have ever done, Bruce. I have never done this       11:03:36

6       in my career, I can assure you of that.       11:03:36

7               MR. BROWN: You are aware that I am       11:03:42

8       not introducing this into evidence, are you not?       11:03:43

9               MR. GRUBMAN: You are asking my       11:03:47

10       witness questions about it and now you are       11:03:47

11       admitting that you made it up and it might not be       11:03:47

12       accurate. I think that's a violation of the       11:03:47

13       ethical rules. I think we need to move on from       11:03:48

14       this document, Bruce.       11:03:50

15               MR. BROWN: Are you familiar with       11:03:51

16       demonstrative evidence?       11:03:53

17               MR. GRUBMAN: Bruce, you just       11:03:56

18       explained that this might be an inaccurate       11:03:57

19       document. I think you need to move on from this       11:04:00

20       document.       11:04:03

21               MR. BROWN: I did not say -- I did not       11:04:04

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1 say anything. 11:04:04

2 MR. GRUBMAN: You said don't assume -- 11:04:05

3 Madam Court Reporter, please read back Mr. Brown's 11:04:07

4 colloquy. 11:04:10

5 MR. BROWN: You don't need to. 11:04:11

6 MR. GRUBMAN: If we want to continue 11:04:11

7 this deposition, Bruce, Madam Court Reporter -- 11:04:13

8 MR. BROWN: I have not asked -- I have 11:04:15

9 not asked the witness a question for the last, I 11:04:16

10 don't know, \$300 in attorneys fees, so if you 11:04:17

11 would let me ask a question maybe we could move on 11:04:21

12 before we need talk to Judge Totenberg about this. 11:04:24

13 Okay? 11:04:27

14 MR. GRUBMAN: Mr. Voyles, I instruct 11:04:28

15 you not to answer any further questions about this 11:04:29

16 document that Mr. Brown admitted on the record and 11:04:33

17 now will not allow me to ask the court reporter to 11:04:36

18 read back, it could contain inaccuracies and he is 11:04:37

19 no -- he is not saying that it is accurate. 11:04:41

20 So now we can move on, Bruce. Go 11:04:42

21 ahead, ask your next question. 11:04:45

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1 BY MR. BROWN: 11:04:47

2 Q Mr. Voyles, do you recall being in the 11:04:48

3 election office four times on January 7th? 11:04:50

4 A I don't know how many times I was 11:04:56

5 there. I know I was there. 11:04:58

6 Q And you were there for -- 11:04:59

7 A I was -- 11:04:59

8 Q I'm sorry, I interrupted you. 11:05:00

9 And you were there for several hours 11:05:02

10 probably over the course of the day? 11:05:05

11 MR. GRUBMAN: Objection. The document 11:05:08

12 is not in evidence. 11:05:11

13 You can answer if you can. 11:05:13

14 A I very well may have been there. I 11:05:14

15 don't remember the length of times that I was 11:05:17

16 there. 11:05:19

17 Q When you were there did you know what 11:05:21

18 the people from Sullivan|Strickler were doing 11:05:24

19 there? 11:05:28

20 A When I was there? I was introduced to 11:05:30

21 the folks, which was the first time I had ever met 11:05:36

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1 anyone, any one of them. I don't know what I was 11:05:39  
2 told as far as what they were doing or why they 11:05:45  
3 were doing it. 11:05:48  
4 Q Did you ask? 11:05:52  
5 A I don't remember if I asked or not. 11:05:53  
6 Q Did you wonder why four or five people 11:05:56  
7 were in the elections office with a bunch of 11:06:00  
8 equipment? 11:06:04  
9 A I'm sure I did wonder. 11:06:06  
10 Q And when you wondered what did you -- 11:06:10  
11 did you resolve that question in your mind? 11:06:13  
12 A I don't have an answer. I don't know 11:06:19  
13 what I did at that point in time. 11:06:21  
14 Q So for the record, you're saying that 11:06:23  
15 you don't know what they were doing? 11:06:25  
16 MR. GRUBMAN: Objection, asked and 11:06:28  
17 answered. 11:06:28  
18 You can answer it again if you want 11:06:33  
19 to, Mr. Voyles. I object to things, but unless I 11:06:36  
20 instruct you not to answer just answer it one more 11:06:45  
21 time and then he will move on. 11:06:49

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1           A           I know I was there. I saw them. I 11:06:51  
2 met them. I don't know what assumptions I made 11:06:54  
3 about what they were doing at this point in time. 11:06:56  
4 I don't recall where my mind was as far as that 11:06:58  
5 goes. 11:07:02

6           Q           What did you think they were doing to 11:07:02  
7 the best of your recollection? 11:07:04

8           MR. GRUBMAN: Objection, asked and 11:07:07  
9 answered. 11:07:07

10                   You can answer if you can. 11:07:08

11           Q           What did you think they were doing? 11:07:19

12           A           I know they were going over equipment. 11:07:21  
13 For what purpose and for whom, I don't know. 11:07:23

14           Q           Before you went to the Coffee County 11:07:27  
15 offices on January 7th did you know that they were 11:07:31  
16 going to be there? 11:07:34

17           A           I do not believe that I knew 11:07:36  
18 Sullivan|Strickler would be there, no. 11:07:38

19           Q           Did you know that someone was going to 11:07:41  
20 be there to make copies of the election equipment? 11:07:44

21           A           I think I knew that Scott Hall was 11:07:48

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1 coming to meet with Misty that day, and I don't 11:07:50

2 remember much other than that. 11:07:54

3 Q Did you know what the purpose of Scott 11:07:58

4 Hall's visit with Misty was going to be? 11:08:00

5 A To meet with her? I don't know the 11:08:04

6 exact intent or whatever from that, no. 11:08:06

7 Q Did you know that it was for the 11:08:11

8 purpose of copying the election equipment? 11:08:12

9 A I don't recall knowing that. 11:08:16

10 Q When did you first learn that the 11:08:19

11 election equipment had been copied on January 7? 11:08:22

12 A I guess I would assume I knew 11:08:31

13 something was going on when I was there. 11:08:34

14 Q And as a former member of the board 11:08:47

15 did you have any questions in your own mind about 11:08:52

16 whether it was appropriate or legal for them to be 11:08:59

17 there making copies of the election equipment? 11:09:02

18 Election software, sorry. 11:09:04

19 A Well, my assumption would be that they 11:09:09

20 were there with approval of the board members. I 11:09:16

21 mean, there was a board member there. There were 11:09:24

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1 employees there. 11:09:28

2 Q Did the -- the board member was Eric 11:09:34

3 Chaney; is that right? 11:09:38

4 A Yes, sir. 11:09:39

5 Q And Misty Hampton also was there, 11:09:41

6 correct? 11:09:44

7 A Yes, sir. 11:09:45

8 Q Were there other board members other 11:09:46

9 than Mr. Chaney there? 11:09:47

10 A I don't recall any. I really, 11:09:50

11 honestly I don't remember. 11:09:53

12 Q Do you recall any discussions with 11:10:00

13 Mr. Chaney about what Sullivan|Strickler was doing 11:10:01

14 or the purpose of what they were doing? 11:10:05

15 A I don't recall any conversations. 11:10:08

16 Q Do you recall any conversations with 11:10:12

17 Ms. Hampton about the purpose of what they were 11:10:15

18 doing? 11:10:20

19 A I don't remember. 11:10:22

20 Q So looking back today you believe you 11:10:28

21 knew that they were copying the election software 11:10:30

1       pursuant to the -- some kind of authorization from       11:10:36

2       either the board or someone in authority, right?       11:10:41

3             A       Would you repeat the question, please?       11:10:46

4             Q       Well, let me just reframe. It was a       11:10:49

5       terrible question.       11:10:51

6                    So to the best of your recollection       11:10:52

7       today, it was your understanding at the time that       11:10:55

8       the people from Sullivan|Strickler had       11:10:59

9       authorization from someone in authority at Coffee       11:11:03

10      County to do what they were doing?       11:11:07

11            A       Yes.       11:11:11

12            Q       And at the time did you think there       11:11:18

13      was anything inappropriate about the board or       11:11:20

14      Ms. Hampton giving Sullivan|Strickler the       11:11:26

15      authority to make copies of Coffee County's       11:11:30

16      election software?       11:11:35

17            A       Could you repeat that, please?       11:11:40

18            Q       At the time did you have any question       11:11:41

19      about whether it was appropriate for the board or       11:11:44

20      Ms. Hampton to give Sullivan|Strickler access to       11:11:48

21      the voting software?       11:11:55

1           A       I don't remember what I was thinking       11:12:01  
2       at that point in time.       11:12:02

3                   MR. BROWN: I'm going to mark as       11:12:20  
4       Exhibit 9, Tab 7.       11:12:22

5                   (Voyles Deposition Exhibit No. 9 was       11:12:30  
6       marked for identification.)       11:12:30

7                   MR. GRUBMAN: All right, we got it.       11:12:51  
8       BY MR. BROWN:       11:12:52

9           Q       Let me direct your attention to the       11:12:52  
10       official election bulletin dated November 7, 2020       11:12:54  
11       that appears on the first page of Exhibit 9.       11:13:00

12                   Do you see that?       11:13:02

13           A       Yes.       11:13:09

14           Q       And you received a copy of this, I       11:13:10  
15       take it, from Garland Favorito?       11:13:13

16           A       I don't remember how I got it.       11:13:18

17           Q       Do you see -- I understand you don't       11:13:20  
18       remember. You see the e-mail there from Garland       11:13:22  
19       Favorito to you, correct?       11:13:25

20           A       Yes, I do.       11:13:28

21           Q       And that is dated December 15; is that       11:13:29

1 right? 11:13:31

2 A Yes. 11:13:32

3 Q So that was several weeks before 11:13:32

4 January 7 when Sullivan|Strickler made the copies 11:13:35

5 of the election equipment, right? 11:13:38

6 A Yes. 11:13:41

7 Q Do you recall Mr. Harvey's election 11:13:53

8 bulletin alerting counties to the possibility that 11:13:55

9 people would be trying to get copies of original 11:14:01

10 software for the voting equipment? 11:14:04

11 A Until seeing this I don't remember it, 11:14:09

12 but I'm sure I saw it at that point in time, 11:14:13

13 that's for sure. 11:14:16

14 Q Right, you saw it at that time but 11:14:17

15 then a couple weeks later Coffee County is doing 11:14:25

16 just what Mr. Harvey said not to do, right? 11:14:28

17 MR. GRUBMAN: Objection. I think that 11:14:35

18 mischaracterizes this document. 11:14:36

19 Q You can answer. 11:14:41

20 A What was the question? 11:14:52

21 Q Didn't Coffee County do exactly what 11:14:54

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1 Mr. Harvey said not to do, and that is give a 11:14:56  
2 third party access to their election software? 11:15:00

3 MR. GRUBMAN: I'm going to state that 11:15:04  
4 Mr. Brown is misquoting this document, and I would 11:15:06  
5 encourage you to read this memo in its entirety 11:15:09  
6 before you answer that question. 11:15:14

7 That's not what this document said, 11:15:15  
8 Bruce, and I think you know that. This has to do 11:15:18  
9 with Open Records Act, which is not what was 11:15:21  
10 happening. And you have a duty of candor to a 11:15:21  
11 witness and I think you violated that right here. 11:15:23

12 MR. BROWN: Absolutely right, and the 11:15:26  
13 objection is so good I'm going to withdraw the 11:15:28  
14 question. 11:15:32

15 MR. GRUBMAN: Good. 11:15:33

16 Q Sullivan|Strickler had not submitted 11:15:34  
17 an Open Records Act request, had they? 11:15:37

18 A I do not know. 11:15:39

19 Q So they came in -- to the best of your 11:15:40  
20 knowledge they came in there to make copies of the 11:15:41  
21 software without even making an Open Records Act 11:15:44

1 request, correct? 11:15:50

2 A I do not know. 11:15:51

3 Q And Mr. Harvey says if someone goes to 11:15:52  
4 the trouble of making an Open Records Act request, 11:15:57  
5 as Mr. Grubman noted, that the county should not 11:15:59  
6 give them a copy of original software of the 11:16:06  
7 voting equipment, right? 11:16:09

8 A I wasn't on the board. I don't know 11:16:15  
9 what arrangements were made. I don't know 11:16:15  
10 anything about what would have transpired prior to 11:16:17  
11 their getting there. 11:16:20

12 Q I'm just following up on Mr. Grubman's 11:16:21  
13 helpful objection. He points out that the memo is 11:16:23  
14 directed to people who go to the trouble of making 11:16:27  
15 an Open Records Act request. And if they do, 11:16:30  
16 counties are not supposed to turn over copies of 11:16:33  
17 original software. 11:16:36

18 My question is since 11:16:38  
19 Sullivan|Strickler did not even go to the trouble 11:16:39  
20 of making an Open Records Act request, to the best 11:16:42  
21 of your knowledge, how is it appropriate and 11:16:45

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1 consistent with Mr. Harvey's memo for Coffee 11:16:46

2 County to let Sullivan|Strickler have a copy of 11:16:51

3 your election equipment? 11:16:55

4 MR. GRUBMAN: Objection, that calls 11:16:57

5 for a legal conclusion. 11:16:57

6 If you can give that legal conclusion, 11:16:59

7 feel free, and if not you can tell Mr. Brown. 11:17:00

8 A I don't know. 11:17:05

9 Q Did you have any recollection of this 11:17:05

10 memo when you were sitting there watching 11:17:07

11 Sullivan|Strickler make copies of the original 11:17:09

12 software in the voting equipment? 11:17:12

13 A I suppose I did. 11:17:18

14 Q Did you discuss with Mr. Chaney or 11:17:21

15 Ms. Hampton whether the Secretary of State would 11:17:24

16 approve or disapprove of Coffee County allowing 11:17:31

17 Sullivan|Strickler to make a copy of the software 11:17:35

18 for the voting equipment? 11:17:40

19 A Would you repeat that once again? Did 11:17:45

20 I? 11:17:49

21 Q Did you discuss with Ms. Hampton or 11:17:50

1 Mr. Chaney whether the Secretary of State would 11:17:52  
2 approve or disapprove of Coffee County allowing 11:17:55  
3 Sullivan|Strickler to make copies of the Coffee 11:17:58  
4 County election software? 11:18:04  
5 A I don't recall if we had any 11:18:06  
6 discussions about it. 11:18:07  
7 Q Do you know if anybody told the 11:18:08  
8 Secretary of State that Sullivan|Strickler had 11:18:10  
9 made copies of the software? 11:18:13  
10 A I do not know. 11:18:15  
11 Q Did you? You didn't, did you? 11:18:17  
12 A No, sir. 11:18:19  
13 Q You didn't view there was anything 11:18:20  
14 wrong with what Sullivan|Strickler was doing, did 11:18:23  
15 you? 11:18:27  
16 MR. GRUBMAN: Objection, asked and 11:18:28  
17 answered. 11:18:28  
18 MR. BROWN: I have not asked it but if 11:18:30  
19 I did, let me ask it again. 11:18:32  
20 Q Did you think there was anything wrong 11:18:34  
21 with Sullivan|Strickler making copies of Coffee 11:18:36

1 County's -- 11:18:39

2 MR. GRUBMAN: Objection, asked and 11:18:43

3 answered. 11:18:43

4 You can answer it again if you can. 11:18:43

5 Q -- original software for the voting 11:18:45

6 equipment? 11:18:47

7 A I didn't know who had arranged it or 11:18:48

8 who had approved it. 11:18:50

9 Q Did you think there was anything wrong 11:18:56

10 with Sullivan|Strickler copying the equipment? 11:18:58

11 MR. GRUBMAN: Objection, asked and 11:19:02

12 answered now for the third time. 11:19:02

13 You can answer one more time and then 11:19:04

14 Mr. Brown will move on. Go ahead. He doesn't 11:19:06

15 like your answer so he keeps asking it but you can 11:19:09

16 answer it the same way. 11:19:13

17 MR. BROWN: Mr. Grubman. Mr. Grubman 11:19:15

18 and Mr. Voyles, let me just say that that is 11:19:16

19 wrong. I asked a different question, but it was 11:19:22

20 close, and so I don't want to trick you. 11:19:26

21 Q Before -- Mr. Grubman, try to follow. 11:19:33

1 Before I asked whether -- 11:19:33

2 MR. GRUBMAN: Let me -- 11:19:33

3 THE REPORTER: Excuse me -- 11:19:33

4 (Reporter seeks clarification.) 11:19:38

5 Q The county -- the first question I 11:19:38

6 asked, okay -- 11:19:38

7 MR. GRUBMAN: If you ask better 11:19:39

8 questions I will be able to follow. Just ask 11:19:39

9 another question. I'm not the deponent. You will 11:19:39

10 never depose me, Bruce. Okay? So ask the next 11:19:40

11 question and then we can come to a conclusion of 11:19:44

12 this deposition in a reasonable time period. If 11:19:46

13 you have arguments with me, you can send me a 11:19:49

14 letter later and we can handle that off the 11:19:52

15 record. 11:19:54

16 MR. BROWN: I have -- 11:19:55

17 MR. GRUBMAN: So go ahead and ask 11:19:55

18 Mr. Voyles the next question. 11:19:57

19 MR. BROWN: I have no argument with 11:19:59

20 you, Scott. 11:20:01

21 MR. GRUBMAN: Next question, please. 11:20:03

1 MR. BROWN: Let me get to the one that 11:20:04

2 I was asking when you interrupted. 11:20:05

3 MR. GRUBMAN: Okay, with an objection. 11:20:07

4 Okay, got it. 11:20:10

5 MR. BROWN: If you will object after I 11:20:11

6 ask it, it will go faster. 11:20:13

7 Mr. Voyles, your attorney may object 11:20:16

8 to this after I ask it so don't answer until you 11:20:17

9 hear his objection, okay? 11:20:21

10 BY MR. BROWN: 11:20:22

11 Q Mr. Voyles, I'm going to ask two 11:20:23

12 different questions. Do you think there was 11:20:24

13 anything wrong with giving, whether it was by the 11:20:26

14 board or by Ms. Hampton, Sullivan|Strickler the 11:20:31

15 authority to make the election copies? 11:20:36

16 MR. GRUBMAN: Same objection. 11:20:40

17 But you may answer. 11:20:42

18 A I'm not one hundred percent sure who 11:20:49

19 approved them coming there so I don't -- I would 11:20:51

20 be speculating, wouldn't I, if I told you that? 11:20:56

21 Q But as far as you know, there was 11:21:03

1 nothing wrong with what was happening on January 11:21:05

2 7th, correct? 11:21:07

3 MR. GRUBMAN: Objection, asked and 11:21:10

4 answered. 11:21:10

5 You may answer again if you can. 11:21:11

6 A I don't know who approved it. I don't 11:21:19

7 know. If it were just the board I suppose you 11:21:20

8 would be correct. 11:21:25

9 Q So if the board approved it, in your 11:21:25

10 view it would be okay? Right? I'm not suggesting 11:21:27

11 that it was wrong but in your view if the board 11:21:29

12 approved it then it was okay, right? 11:21:32

13 A I don't -- I don't -- I don't know. 11:21:42

14 Q Do you know if the board officially 11:21:46

15 approved it? 11:21:48

16 A I do not know. 11:21:50

17 MR. GRUBMAN: All right, Bruce at this 11:21:51

18 point we are going to take a five-minute comfort 11:21:52

19 break. So we will be back on the record in five 11:21:56

20 minutes. Thank you. 11:21:58

21 MR. BROWN: Mr. Grubman, you can break 11:22:02

1 at any time you want. That's fine. Thank you. 11:22:03

2 THE VIDEO OPERATOR: The time on the 11:22:07

3 monitor is now 11:22 a.m. and we are off the 11:22:08

4 record. 11:22:12

5 (Recess taken -- 11:22 a.m.) 11:22:13

6 (After recess -- 11:29 a.m.) 11:22:18

7 THE VIDEO OPERATOR: Stand by. 11:30:12

8 The time is -- 11:30:19

9 MR. BROWN: Are we back on the record? 11:30:27

10 THE VIDEO OPERATOR: We are good. 11:30:29

11 The time on the monitor is 11:30 a.m. 11:30:30

12 and we are on the record. 11:30:33

13 BY MR. BROWN: 11:30:35

14 Q Mr. Voyles, let me get you back to 11:30:36

15 Exhibit 9. 11:30:38

16 Do you recall why you forwarded that 11:30:43

17 official election bulletin to Mr. Chaney and 11:30:44

18 Ms. Hampton and Ms. Latham? 11:30:50

19 A I do not recall. 11:30:55

20 MR. BROWN: We will mark as 11:31:18

21 Exhibit 10, Tab 3. 11:31:19

1 (Voyles Deposition Exhibit No. 10 was 11:31:21  
2 marked for identification.) 11:31:21

3 MR. BROWN: That is some photographs. 11:31:40  
4 It may take some time to upload so let me know 11:31:42  
5 when you can see them, Mr. Grubman and Mr. Voyles. 11:31:45

6 MR. GRUBMAN: Okay. 11:31:48

7 I keep pressing refresh so I will let 11:32:21  
8 you know when it comes up. 11:32:24

9 MR. BROWN: Thank you. 11:32:26

10 MR. GRUBMAN: All right. He got it. 11:32:49

11 BY MR. BROWN: 11:32:53

12 Q You see the photograph that is the 11:32:53  
13 first page of Exhibit 10? 11:32:55

14 A Yes. 11:33:01

15 Q And can you -- are you shown in that 11:33:02  
16 photograph? 11:33:07

17 A Yes, sir. 11:33:08

18 Q And where are you in that photograph? 11:33:10  
19 Right in the middle? 11:33:15

20 A I'm in the tan shirt with sunglasses 11:33:17  
21 on my head. 11:33:19

1 Q And who is that to your right, sitting 11:33:25  
2 at the desk? 11:33:30  
3 A That's Cathy Latham. 11:33:31  
4 Q And who is to your left standing at 11:33:33  
5 the desk? 11:33:35  
6 A I do not know. 11:33:36  
7 Q And do you know who the person who you 11:33:38  
8 are facing is who is on the laptop? 11:33:40  
9 A I do not know. 11:33:43  
10 Q Is the person to your left standing at 11:33:45  
11 the window, the office window, is that Mr. Chaney? 11:33:49  
12 A With the camo jacket on? 11:33:54  
13 Q Yes. 11:33:58  
14 A Yes, I believe it is. 11:33:58  
15 Q And do you know who the gentleman is 11:34:00  
16 who is entering the frame on the right? 11:34:03  
17 A I do not. 11:34:06  
18 Q Do you believe that might be someone 11:34:07  
19 from Sullivan|Strickler or you just don't recall? 11:34:10  
20 A I don't know who that is. Do you have 11:34:16  
21 another picture of him? 11:34:19

1           Q       I might. And this is the election       11:34:20  
2       office, correct?       11:34:22

3           A       It is.       11:34:23

4           Q       And the time stamp at the top of the       11:34:25  
5       photo says January 7, 2021, 12:54.       11:34:27

6                   Do you see that?       11:34:31

7           MR. GRUBMAN: I'm sorry. We have to       11:34:38  
8       maximize the screen here. Hold on one second.       11:34:39  
9       I'm trying to make it so that he can see you and       11:34:43  
10       the screen at the same time. Okay, that might       11:34:45  
11       work.       11:34:48

12                   Okay, so there you go.       11:34:52

13           THE WITNESS: Okay.       11:34:54

14           MR. GRUBMAN: He asked about the time       11:34:59  
15       and the date.       11:35:01

16                   Do you see that?       11:35:01

17           A       I can see the time and the date, yes.       11:35:02

18           Q       And I believe you testified before       11:35:05  
19       that you do recall being at the election office on       11:35:07  
20       that date, right?       11:35:10

21           A       Yes, sir.       11:35:11

1 Q And what were you doing there again? 11:35:12

2 A I don't know. I just pop in 11:35:19

3 occasionally. 11:35:21

4 Q If you would, scroll down to the 11:35:27

5 second page of Exhibit 10. 11:35:31

6 Do you see that? 11:35:44

7 A Yes. 11:35:46

8 Q That's you on the right; is that 11:35:46

9 right? 11:35:49

10 A Correct. 11:35:50

11 Q And do you know who is sitting at the 11:35:52

12 table besides Ms. Latham? 11:35:56

13 A I don't know any names. No, I do not 11:36:01

14 know those two people. 11:36:04

15 Q Do you believe that those are two of 11:36:06

16 the people from Sullivan|Strickler? 11:36:07

17 A I expect they would be, yes, sir. 11:36:10

18 Q And you see the time stamp there is 11:36:14

19 5:48 p.m.? 11:36:17

20 A Yes, sir. 11:36:21

21 Q If you go to the third page, I don't 11:36:26

1 have any questions on the third page. 11:36:34

2 If you go down to the fourth page. 11:36:36

3 A I'm there. 11:36:55

4 Q And do you see the time stamp there is 11:36:56

5 7:42 p.m.? 11:37:00

6 A Yes, sir. 11:37:02

7 Q And do you know who the women are who 11:37:06

8 are embracing there? 11:37:10

9 A I know, I'm pretty sure the blue shirt 11:37:14

10 would be Misty. I don't know the names of the 11:37:18

11 other people. 11:37:23

12 Q Do you know the gentleman who is to 11:37:25

13 Misty's left who is walking, looks like he is 11:37:27

14 walking out? 11:37:32

15 A I don't know who he is, no, sir. I 11:37:34

16 can only assume but -- 11:37:40

17 Q That's okay. 11:37:43

18 If you would scroll down to the fifth 11:37:49

19 photograph. 11:37:52

20 A Yes, sir. 11:37:58

21 Q Is that you leaving the election 11:37:59

1 office at 8:43 p.m.? 11:38:01

2 A Yes, sir. 11:38:05

3 Q And after looking at these 11:38:07

4 photographs, does that refresh your recollection 11:38:10

5 about what you were doing or what you knew was 11:38:12

6 happening? 11:38:17

7 A I just know I was there. 11:38:21

8 Q And you don't recall any more 11:38:28

9 information, knowing what they were doing? 11:38:31

10 A Well, obviously they were looking at 11:38:35

11 equipment and going through equipment but I don't 11:38:38

12 know for sure. 11:38:40

13 Q Do you recall the purpose of their 11:38:42

14 looking at the equipment? 11:38:44

15 A I wasn't involved in setting any of 11:38:54

16 that up, to have them come or to be there, or any 11:38:57

17 of that, so I don't know. 11:39:00

18 Q So we have seen photographs of you 11:39:04

19 being there throughout the afternoon and evening. 11:39:07

20 And is it your testimony that you don't recall the 11:39:11

21 purpose of Sullivan|Strickler being there? 11:39:15

1 MR. GRUBMAN: Objection, asked and 11:39:20  
2 answered. 11:39:20

3 You can answer. 11:39:21

4 A As I said, I didn't set them up to 11:39:22  
5 come. I don't know all the details there so ... 11:39:25

6 Q I didn't ask about details. Just 11:39:36  
7 generally do you know why they were there? 11:39:40

8 A Like I said, I did not schedule them. 11:39:47  
9 I didn't set them up. I didn't arrange it. I 11:39:49  
10 went there. I was there for a while. I don't 11:39:53  
11 know all the details. I don't know. 11:39:55

12 Q I'm not asking about details. Do you 11:39:59  
13 know generally why they were there? 11:40:03

14 A I'm assuming they were there looking 11:40:05  
15 at the equipment. 11:40:07

16 Q Was it to fix the equipment, to copy 11:40:08  
17 the equipment, to bug the equipment, or any of the 11:40:11  
18 above? 11:40:13

19 A I didn't arrange it. I don't know. 11:40:14

20 Q So they might have been there to bug 11:40:17  
21 the equipment for all you know, right? 11:40:19

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1	A	I don't know.	11:40:23
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2	MR. GRUBMAN: I don't know that there	11:40:26
3	is any good faith basis for that question, Bruce,	11:40:27
4	so you might want to move on to the next one	11:40:30
5	there.	11:40:33

6	MR. BROWN: I'm trying to see what he	11:40:34
7	remembers.	11:40:35

8	MR. GRUBMAN: Okay. I mean, it's	11:40:36
9	possible that they were there to commit a murder,	11:40:37
10	too, but, you know, there is a limit on the	11:40:41
11	assumptions a lawyer can make behind a question	11:40:43
12	and I think you have hit that limit so we can move	11:40:47
13	on to the next question, please.	11:40:50

14	Q	Do you recall bringing any equipment	11:40:53
15		to the Coffee County election office on January	11:40:55
16		7th?	11:40:59

17	A	I don't.	11:41:01
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18	Q	Do you recall bringing a scanner into	11:41:03
19		the office?	11:41:06

20	A	I don't.	11:41:08
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21 MR. BROWN: I'm going to mark as 11:41:36

1 Exhibit 11, Tab 29. 11:41:37

2 (Voyles Deposition Exhibit No. 11 was 11:41:39

3 marked for identification.) 11:41:39

4 MR. GRUBMAN: While we are letting 11:42:03

5 this load I was hoping, Bruce, you would ask about 11:42:04

6 that dog, you know, I want to know what the flip 11:42:07

7 that dog was doing there. You got to everyone but 11:42:10

8 him. 11:42:13

9 MR. BROWN: The dog was there for the 11:42:17

10 crushed ice. 11:42:19

11 MR. GRUBMAN: Probably. All right, we 11:42:21

12 have 11 up. 11:42:22

13 Can you see that? 11:42:23

14 THE WITNESS: Yes. 11:42:25

15 BY MR. BROWN: 11:42:31

16 Q Mr. Voyles, do you see Number 11? 11:42:32

17 A I do. 11:42:34

18 Q And is that you carrying something 11:42:35

19 back into the election office? 11:42:37

20 A It is. 11:42:40

21 Q What is it? 11:42:41

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1 A I don't know. 11:42:43

2 Q You don't remember? 11:42:45

3 A No. 11:42:46

4 Q Do you remember what you are carrying? 11:42:46

5 A I don't. 11:42:51

6 Q Do you recall that it might have been 11:42:53

7 a scanner? 11:42:55

8 A I suppose it could have been. 11:42:59

9 Q Do you recall bringing a scanner from 11:43:02

10 Ms. Latham's church back into the election office 11:43:04

11 on January 7th? 11:43:09

12 A I really don't remember but it very 11:43:10

13 well looks that way. 11:43:12

14 Q And do you recall the purpose of 11:43:14

15 bringing a scanner back into the election office 11:43:15

16 on January 7th at about 2:39? 11:43:20

17 A I don't know exactly what they were 11:43:24

18 scanning. I don't remember. I assume they were 11:43:26

19 scanning documents. 11:43:29

20 Q Did you see them scanning anything? 11:43:30

21 A I don't remember. I mean, I -- I 11:43:34

1 would have to see the video to know if I did or 11:43:38

2 not. 11:43:42

3 Q Do you recall someone asking you to go 11:43:42

4 get the church scanner, the church's scanner? 11:43:44

5 A I do not recall that but it very well 11:43:49

6 could have been the case. I could have been asked 11:43:52

7 to go get it. 11:43:55

8 Q Do you recall going to go get it? 11:43:57

9 A I truly don't recall that, but I'm in 11:43:59

10 the picture there. 11:44:02

11 Q Were they scanning ballots, do you 11:44:10

12 know? 11:44:15

13 A As I said, I don't recall. They 11:44:16

14 surely could have been. 11:44:22

15 Q Do you know why they were not using 11:44:29

16 the scanner that was already in the election 11:44:31

17 office? 11:44:34

18 A I don't. I don't know if it's 11:44:36

19 functioning or what. I have no idea. 11:44:39

20 MR. BROWN: I'm going to mark as 11:45:08

21 Exhibit 12, Tab 4. 11:45:09

1 (Voyles Deposition Exhibit No. 12 was 11:45:11  
2 marked for identification.) 11:45:11

3 MR. GRUBMAN: Mr. Voyles, by this time 11:45:16  
4 you should be able to do this. All you have to do 11:45:18  
5 is press backwards and refresh. 11:45:20

6 Okay, all right. That's why you pay 11:45:25  
7 me the big bucks. 11:45:27

8 THE WITNESS: You got me sitting here. 11:45:28

9 MR. GRUBMAN: That's true. That's 11:45:42  
10 true. Hold on one second, Bruce. We are 11:45:42  
11 reloading. 11:45:46

12 Bruce, I ordered lunch and I'm happy 11:45:48  
13 just to eat it while you all go, like, in about 11:45:50  
14 15, 20 minutes. So either, it's up to you, we can 11:45:52  
15 take a lunch break -- Mr. Voyles didn't order 11:45:54  
16 lunch -- or I can just turn off my camera while 11:45:55  
17 I'm eating and eat it while you go. You decide. 11:45:58  
18 We can talk about it a little after noon. 11:46:02

19 MR. BROWN: Sure. We will take a 11:46:06  
20 break. What is the optimal time for you, Scott? 11:46:07

21 MR. GRUBMAN: Like 12, 12:15. Next 30 11:46:12

1 minutes or so. Is that good for you? 11:46:16

2 THE WITNESS: That's fine with me. 11:46:21

3 MR. GRUBMAN: All right, we have 12. 11:46:23

4 BY MR. BROWN: 11:46:26

5 Q And you see the first photograph in 11:46:26

6 12? 11:46:28

7 A It's a picture of me sitting there, 11:46:32

8 leaning back. 11:46:36

9 Q That's correct. 11:46:37

10 A Yes, sir. 11:46:38

11 Q Now, I will represent to you that 11:46:39

12 these are photographs that were produced by 11:46:41

13 Sullivan|Strickler. Does that -- you don't have 11:46:44

14 to believe me, of course. Does that appear to be 11:46:48

15 a photograph taken on January 7th, the same day 11:46:52

16 that Sullivan|Strickler was there? 11:46:57

17 A I have on the same clothes and Eric 11:47:00

18 does also, so I would assume so. 11:47:02

19 Q If you would, scroll down two pages to 11:47:16

20 Page 3 of Exhibit 12. 11:47:19

21 A Okay. 11:47:26

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1           Q       Did you see Sullivan|Strickler doing       11:47:27  
2       what is depicted here?       11:47:29

3           A       I do not remember. I mean, you saw --       11:47:37  
4       you saw where I was sitting so I don't know if I       11:47:42  
5       could see this from there or not.       11:47:45

6           Q       Fair enough.       11:47:47

7           A       I don't think I could.       11:47:48

8           Q       If you scroll down a couple more       11:47:50  
9       pages --       11:47:53

10           THE WITNESS: What page is this? It       11:48:00  
11       says 12 of 12.       11:48:03

12           MR. GRUBMAN: No, that's the files so       11:48:05  
13       -- that's the page right there.       11:48:05

14           THE WITNESS: Page 4?       11:48:09

15           Q       Go down one more to Page 5. I have a       11:48:10  
16       question for you that's not related to the       11:48:13  
17       photographs in particular.       11:48:16

18                   But in the election office are you       11:48:18  
19       familiar with what they call the GEMS room?       11:48:20

20           A       Yes.       11:48:26

21           Q       And were the Sullivan|Strickler people       11:48:27

1 in the GEMS room also doing whatever they were 11:48:30

2 doing? 11:48:34

3 A I don't know. I know the previous 11:48:34

4 picture appeared to be Misty's office but I don't 11:48:37

5 know. 11:48:40

6 Q If you look at Page 5 of Exhibit 12 -- 11:48:42

7 A Yes, sir. 11:48:46

8 Q -- do you recall seeing 11:48:47

9 Sullivan|Strickler lay out a bunch of memory cards 11:48:49

10 and mark them like this? 11:48:53

11 A I don't recall that. 11:48:55

12 Q Do you recall Sullivan|Strickler 11:49:35

13 making images from the January 6 election that had 11:49:36

14 just been completed? 11:49:41

15 A I truly don't know what they were 11:49:42

16 imaging or doing. 11:49:45

17 MR. BROWN: Scott, this is a pretty 11:50:10

18 good break time for me. If this is a good time 11:50:11

19 for you, we can break if that's all right. 11:50:15

20 MR. GRUBMAN: Sounds good. 11:50:19

21 When do you want us to come back? 11:50:21

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1	MR. BROWN:	12:30.	11:50:24
2	MR. GRUBMAN:	That sounds good.	11:50:26
3	MR. BROWN:	Okay, thank you.	11:50:29
4	THE VIDEO OPERATOR:	The time on the	11:50:31
5	monitor is	11:50 a.m. and we are off the record.	11:50:32
6		(Recess taken -- 11:50 a.m.)	11:50:37
7		(After recess -- 12:31 p.m.)	12:31:46
8	THE VIDEO OPERATOR:	Stand by.	12:31:55
9		The time on the monitor is 12:32 p.m.	12:32:27
10		and we are on the record.	12:32:31
11	BY MR. BROWN:		12:33:06
12	Q	If I could have you turn back to	12:33:06
13		Exhibit 4, which was Tab 43.	12:33:08
14	MR. GRUBMAN:	All right, we are there.	12:33:12
15	Q	Can you go to the 21st page of that	12:33:18
16		pdf, please?	12:33:22
17	MR. GRUBMAN:	All right.	12:33:39
18	Q	And do you see the December 10 letter	12:33:40
19		there?	12:33:43
20	THE REPORTER:	I can't hear the	12:33:45
21		witness.	12:33:45

1	A	I see the December 4. Let's see.	12:33:46
2	Q	Right.	12:33:49
3		MR. GRUBMAN: I think maybe he just	12:33:52
4		misspoke. Go back.	12:33:53
5		THE WITNESS: There's a December 11	12:34:02
6		letter.	12:34:02
7		MR. GRUBMAN: That's November 11. Go	12:34:02
8		back to where he asked you to be.	12:34:02
9		What page was that?	12:34:03
10		MR. BROWN: Page 21 of that pdf.	12:34:05
11		MR. GRUBMAN: All right, there you go.	12:34:10
12		THE WITNESS: Okay.	12:34:12
13		BY MR. BROWN:	12:34:13
14	Q	What do you see there, just to make	12:34:14
15		sure we are looking at the same thing?	12:34:15
16	A	Yes. December 4 letter to Brad	12:34:17
17		Raffensperger from Coffee Board of Elections.	12:34:21
18	Q	Right, and do you see the attachments	12:34:27
19		to that?	12:34:29
20	A	Yes, sir.	12:34:33
21	Q	Do you recall your testimony that you	12:34:34

1           were referring to different data about --           12:34:35

2           A       Yes. The spreadsheet.           12:34:39

3           Q       The spreadsheets?           12:34:41

4           A       Yes, sir.           12:34:42

5           Q       Is that the document that contains           12:34:43

6           those spreadsheets?           12:34:45

7           A       Yes, sir.           12:34:46

8           Q       That's what I wanted to connect up           12:34:46

9           with you. Thank you.           12:34:51

10          A       Thank you.           12:34:52

11          Q       And you helped the team put those           12:34:53

12          numbers together; is that right?           12:34:56

13          A       Yes. I was there and I think -- I           12:34:59

14          think Mr. Rowell was kind of making sure it all           12:35:02

15          came together.           12:35:07

16          Q       And Mr. Rowell was the county           12:35:09

17          attorney?           12:35:11

18          A       Yes, sir.           12:35:12

19                   MR. BROWN: I would like to mark as           12:35:14

20          Exhibit 13 --           12:35:16

21                   THE REPORTER: 14.           12:35:25

1 MR. BROWN: I didn't mark this last 12:35:27  
2 one. It was already an exhibit, that's why. So 12:35:28  
3 to clarify, Ms. Hallock, the document that I was 12:35:32  
4 just referring to had previously been marked as 12:35:36  
5 Exhibit 4, and so the next one will be Exhibit 13. 12:35:40  
6 THE REPORTER: Thank you. 12:35:44  
7 MR. BROWN: And that is Tab 8. 12:35:46  
8 BY MR. BROWN: 12:36:11  
9 Q Do you see Exhibit 13, Mr. Voyles? 12:36:11  
10 MR. GRUBMAN: Not yet. 12:36:19  
11 MS. CONAWAY: Mr. Brown, I don't have 12:36:22  
12 a Tab 8. Could you send it to me? 12:36:25  
13 MR. BROWN: Why don't we skip that 12:36:29  
14 one. 12:36:30  
15 All right, we will mark as Exhibit 13, 12:37:08  
16 Tab 5. 12:37:10  
17 (Voyles Deposition Exhibit No. 13 was 12:37:12  
18 marked for identification.) 12:37:12  
19 MR. GRUBMAN: All right, we got it. 12:37:41  
20 BY MR. BROWN: 12:37:44  
21 Q Mr. Voyles, in your capacity as a 12:37:45

1 board member of the Coffee County Board of 12:37:49  
2 Elections in years previous, were you familiar 12:37:52  
3 generally with the regulations that the state 12:37:56  
4 issued relating to security of voting system 12:38:00  
5 components? 12:38:06

6 A Yes. 12:38:07

7 Q And if you look at Exhibit 13, do you 12:38:10  
8 see Paragraph 1? 12:38:13

9 A Yes. 12:38:21

10 Q It says, "Software security." It 12:38:23  
11 says, "The software contained in electronic ballot 12:38:29  
12 markers," et cetera, "shall not be modified, 12:38:33  
13 upgraded or changed in any way without the 12:38:35  
14 specific prior approval of the Secretary of 12:38:39  
15 State." 12:38:41

16 Do you see that? 12:38:44

17 A I do see that. 12:38:44

18 Q Is it your understanding that 12:38:46  
19 Sullivan|Strickler was there to modify, upgrade or 12:38:48  
20 change in any way the software? 12:38:53

21 A I don't know that. 12:38:55

1	Q	You don't know that one way or the	12:38:56
2		other?	12:38:58

3	A	I don't, correct.	12:38:58
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4	Q	And you were not aware of any prior	12:39:00
5		approval by the Secretary of State for any of	12:39:05
6		that, were you?	12:39:09

7	A	I don't know.	12:39:10
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8	Q	You're not aware of any approval --	12:39:14
9		people at Coffee County didn't run this past the	12:39:18
10		Secretary of State before Sullivan Strickler got	12:39:21
11		there, right; fair to say?	12:39:24

12	A	I would not know that.	12:39:28
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13	Q	Let me turn to Paragraph 3 of	12:39:40
14		Exhibit 13, the first page.	12:39:43

15	A	Yes, sir.	12:39:48
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16	Q	Do you see "Where the election	12:39:49
17		management system is located should be locked at	12:39:51
18		all times when the system is not directly under	12:39:54
19		the supervision of the election superintendent"?	12:39:57

20	A	I do see that.	12:40:00
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21	Q	Did Coffee County, from your	12:40:02
----	---	------------------------------	----------

1 perspective, follow that instruction? 12:40:04

2 A At what point in time? 12:40:13

3 Q The whole day. 12:40:15

4 A Well, the election superintendent and 12:40:18

5 designees were there. 12:40:22

6 Q Was she there the entire time that you 12:40:28

7 saw? 12:40:31

8 A Geez, I don't know. 12:40:32

9 Q Did you ever hear that 12:40:39

10 Sullivan|Strickler's purpose to being there was to 12:40:40

11 fix the problems that Coffee County was having 12:40:44

12 with the scanner? 12:40:48

13 A I don't know that answer. I don't 12:40:50

14 know if that was why they were there or not. I 12:40:52

15 don't know. 12:40:57

16 Q Did Misty Hampton ever tell you that 12:41:01

17 that was why they were there, to address problems 12:41:04

18 that she was having with the scanner? 12:41:08

19 A I don't know. Very well could have, I 12:41:11

20 just don't remember. 12:41:13

21 Q I believe you testified to this, and 12:41:52

1 Mr. Grubman, I apologize if this is asked and 12:41:54  
2 answered, but are you aware of anybody at Coffee 12:41:58  
3 County or anybody else informing the Secretary of 12:42:01  
4 State that Sullivan had been there to have access 12:42:04  
5 to Coffee County's election equipment? 12:42:07  
6 A I'm not aware. 12:42:10  
7 Q Who did you tell, if anybody, that 12:42:12  
8 people had been in the election office in Coffee 12:42:17  
9 County in early January with access to Coffee 12:42:21  
10 County's election equipment? 12:42:25  
11 A I don't recollect telling anyone. 12:42:29  
12 Q Did you keep it a secret or did you 12:42:33  
13 just not have occasion to tell anybody? 12:42:35  
14 A I had no reason to tell anyone, no 12:42:38  
15 occasion. 12:42:40  
16 Q Do you know who was paying 12:43:04  
17 Sullivan|Strickler to do their work? 12:43:05  
18 A I don't. 12:43:09  
19 Q Did you believe or do you know if 12:43:13  
20 Coffee County was paying Sullivan|Strickler? 12:43:15  
21 A I do not know. 12:43:18

1 Q Did you ever ask? 12:43:19

2 A No, I did not. 12:43:21

3 Q Were you curious? 12:43:23

4 A I don't recall. 12:43:26

5 Q I mean, there is four professionals 12:43:26

6 going in there to do a lot of work. You never 12:43:30

7 thought about who is paying for this to happen? 12:43:35

8 MR. GRUBMAN: Objection, asked and 12:43:39

9 answered. 12:43:39

10 You can answer if you can. 12:43:42

11 A I don't recall if I thought about it 12:43:46

12 or not. 12:43:48

13 Q Do you know if anybody in Coffee 12:43:55

14 County was paid to allow Sullivan|Strickler to 12:43:57

15 have access to the county election equipment? 12:44:00

16 A I do not know if they were or not. 12:44:03

17 MR. BROWN: I'm going to mark as 12:44:17

18 Exhibit 14, Tab 18. 12:44:19

19 (Voyles Deposition Exhibit No. 14 was 12:44:25

20 marked for identification.) 12:44:25

21

1	BY MR. BROWN:	12:44:57
2	Q Do you have Exhibit 14 in front of	12:44:58
3	you?	12:45:00
4	A It's coming up.	12:45:01
5	MR. GRUBMAN: I got it.	12:45:09
6	Q Do you recall this as being a text	12:45:10
7	exchange between you and Marilyn Marks?	12:45:12
8	A I believe it was, yes.	12:45:31
9	Q And it is dated, or the first text is	12:45:37
10	March 8, 2021, correct?	12:45:39
11	A Yes.	12:45:42
12	Q And in the second message Ms. Marks	12:45:45
13	says, "A guy named Scott Hall called me last night	12:45:49
14	saying that he paid for (part or all) of an effort	12:45:53
15	that obtained image of server and a bunch of other	12:45:56
16	machines in Coffee County and that the full board	12:46:02
17	had approved the imaging of the equipment."	12:46:06
18	Do you know if that is true? Do you	12:46:09
19	see that?	12:46:12
20	A I do see that.	12:46:12
21	Q And your answer was, "Question mark,	12:46:13



1 Q Did you know or believe that to be a 12:47:16  
2 genuine reason for her termination? 12:47:18

3 A Do I know for certain? I can't know 12:47:24  
4 for certain but I actually talked to Misty and 12:47:28  
5 that's what I was told. 12:47:35

6 Q And Misty told you she was terminated 12:47:39  
7 because of the time sheets? 12:47:41

8 A I believe that's correct. 12:47:44

9 Q Do you see where Ms. Marks says, "That 12:47:55  
10 sounded odd to me, too"? And then you say, "I 12:47:58  
11 wondered if Dominion threatened county with suit." 12:48:04

12 Do you see that? 12:48:12

13 A Yes. 12:48:13

14 Q And what did you mean by that, if you 12:48:14  
15 recall? 12:48:16

16 A Geez. I really don't know. It has 12:48:18  
17 been quite a while ago for that context to be 12:48:23  
18 clear to me. 12:48:26

19 Q But are you aware of any threatened 12:48:31  
20 suit by Dominion? 12:48:35

21 A No, I wasn't that I'm aware of. I 12:48:37

1 mean, you can't get the -- you can't get numbers 12:48:40  
2 to match when you run them time after time you 12:48:44  
3 start to wonder what's going on. I can't really 12:48:47  
4 speak to that at this point in time. I don't 12:48:51  
5 know. 12:48:55

6 Q But you don't -- you don't have any 12:48:57  
7 facts -- well, let me back up a second. 12:48:59

8 You don't recall any specific or even 12:49:03  
9 general threats that Dominion made against the 12:49:06  
10 county, do you? 12:49:09

11 A No, sir, I don't know of any. 12:49:10

12 Q Okay. 12:49:12

13 Do you know if Dominion was informed 12:49:13  
14 of the fact that Sullivan|Strickler had access to 12:49:19  
15 Coffee County's election equipment in early 12:49:23  
16 January 2021? 12:49:25

17 A I have no idea, no. 12:49:27

18 Q Did you ever have any communications 12:49:29  
19 with anybody from Dominion after -- 12:49:31

20 A No. 12:49:35

21 Q -- after you terminated from the 12:49:35

1 board? 12:49:38

2 A No, sir. Dominion -- when I was on 12:49:39

3 the board Dominion was not the system in use. 12:49:43

4 Q If you go down, back to Exhibit 14, 12:49:48

5 Ms. Marks says, "But Scott Hall said that he 12:49:56

6 didn't get his images and files?" And then she 12:50:01

7 says, "Do you think that someone actually got an 12:50:06

8 image?" And then your response is, "I don't 12:50:10

9 know." 12:50:14

10 Do you see that? 12:50:14

11 A Yes, sir. 12:50:15

12 Q At that time, though, you did know 12:50:16

13 that Sullivan|Strickler had been in there getting 12:50:18

14 images, right? 12:50:21

15 A I knew Sullivan|Strickler was there, 12:50:23

16 yes. 12:50:26

17 Q But you didn't know if they were 12:50:27

18 getting images. Is that what you're saying? 12:50:29

19 A I'm not exactly sure everything that 12:50:32

20 they did do. I don't know everything that they 12:50:35

21 did. 12:50:38

1           Q       But just for the record, you didn't       12:50:39  
2       disclose to Ms. Marks that you were there, that       12:50:42  
3       you saw them there, correct?       12:50:45  
4           A       No, I did not.       12:50:47  
5           Q       And you didn't disclose that to her       12:50:49  
6       either in this text or in the telephone call or in       12:50:52  
7       any other fashion, correct?       12:50:56  
8           A       No, sir.       12:50:58  
9           Q       Do you know what Eric Chaney's role       12:51:11  
10       was in making arrangements for Sullivan|Strickler       12:51:13  
11       to have access to the Coffee County election       12:51:18  
12       equipment?       12:51:21  
13          A       No, sir, I don't know.       12:51:23  
14          Q       Do you know if he had one at all?       12:51:26  
15          A       I don't know.       12:51:28  
16          Q       Same question for Cathy Latham. Do       12:51:30  
17       you know what her role was?       12:51:33  
18          A       I don't know.       12:51:36  
19          Q       Do you know what she was doing there       12:51:36  
20       on January 7th?       12:51:38  
21          A       I don't know. Just she was there, I       12:51:48

1 do know that. I know I was there. 12:51:51

2 Q Was she checking to make sure the work 12:51:53

3 was getting done? 12:51:57

4 A I have no idea. 12:51:58

5 Q What was your understanding of Scott 12:52:02

6 Hall's role in making arrangements for 12:52:04

7 Sullivan|Strickler to be there? 12:52:08

8 A I don't know what his role would have 12:52:11

9 been at that point. I knew -- to the best of my 12:52:12

10 recollection, I knew he had talked to Misty and I 12:52:16

11 thought he was coming to meet with her, so I don't 12:52:20

12 know what his role was past that. 12:52:24

13 Q And he is a bail bondsman? 12:52:27

14 A That was my understanding. 12:52:31

15 Q And you don't know why he was meeting 12:52:33

16 with the elections director of Coffee County? 12:52:35

17 A I don't recall if I did. I don't 12:52:38

18 know. 12:52:40

19 Q When you learned that a bail bondsman 12:52:42

20 was meeting with the elections director of Coffee 12:52:45

21 County, did you ask why? 12:52:48

1           A       I may have. I just do not recall all       12:52:55  
2       the details about all this.                               12:52:58

3           Q       Now, you are aware that Scott Hall was       12:53:04  
4       meeting with Missy Hampton for the purpose of       12:53:06  
5       obtaining a forensic copy of the election               12:53:10  
6       equipment, right?                                       12:53:14

7           A       I knew he was meeting with her. The       12:53:15  
8       purpose I don't think I knew. I mean, it               12:53:17  
9       certainly could have been about the election.       12:53:26  
10      I -- I --   12:53:29

11          Q       And do you know who Alex Cruce is?       12:53:33

12          A       No, sir.                                   12:53:39

13          Q       Do you recall a gentleman who came       12:53:40  
14       with Mr. Hall to Coffee County?                   12:53:43

15          A       I don't. I don't know that I met       12:53:45  
16       Mr. Hall. I may have. I just don't know.           12:53:50

17          Q       And did you know that he came in on an   12:53:53  
18       airplane, his own airplane?                       12:53:55

19          A       Well, I mean some of the text messages   12:53:59  
20       say that, right?                                   12:54:02

21          Q       And did you know that at the time?       12:54:03

1           A       It seems like -- it seems like a text       12:54:12  
2       message from Misty might have said he was flying       12:54:14  
3       in. I don't know if it was his own plane, a       12:54:17  
4       rented plane. I don't know.       12:54:20

5           Q       But he was flying in and       12:54:22  
6       Sullivan|Strickler people were coming in but your       12:54:25  
7       testimony today is still that you really weren't       12:54:27  
8       sure what any one of them were doing there, right?       12:54:30

9           A       That's the best of my recollection.       12:54:35

10          Q       I believe your testimony was that no       12:54:53  
11       one from Coffee County that you were aware of told       12:54:57  
12       the Secretary of State that Sullivan|Strickler had       12:55:01  
13       access to the election equipment. This is a       12:55:06  
14       little bit different question.       12:55:08

15               MR. GRUBMAN: I object to, asked and       12:55:11  
16       answered.       12:55:14

17               But Mr. Voyles, you can answer.       12:55:14

18          Q       When did you first hear that the       12:55:17  
19       Secretary of State had become aware of the copying       12:55:19  
20       of the voting system in Coffee County in January       12:55:24  
21       of 2021?       12:55:27



1 think it was the 18th, that Doug Logan and Jeff 12:57:04

2 Lamberg came to the Coffee County election office? 12:57:11

3 A No, sir. 12:57:15

4 Q And do you know who Doug Logan is? 12:57:16

5 A I've heard the name but that's about 12:57:20

6 it. I think my wife has mentioned that name to me 12:57:22

7 before on something she had seen on the internet 12:57:25

8 but I don't know him. 12:57:30

9 Q Are you familiar -- Doug Logan is the 12:57:33

10 founder, I will just say to you, it might refresh 12:57:36

11 your recollection, Doug Logan's company is called 12:57:40

12 Cyber Ninjas. Have you heard of that company? 12:57:45

13 A I don't know the company but I have 12:57:50

14 heard the name, yes, after all of this, through 12:57:51

15 news and feeds or whatever. 12:57:56

16 Q But you were not aware at the time, 12:57:59

17 that is mid-January, January 18-19, in that time 12:58:01

18 frame, that Mr. Logan and Mr. Lamberg were in the 12:58:04

19 offices of the Coffee County elections? 12:58:09

20 A No. I very well could have been in 12:58:15

21 Colorado at that point and not in Douglas so I 12:58:18

1 don't think I would have known that they were 12:58:22  
2 there. 12:58:23

3 Q Did you learn what they were doing 12:58:29  
4 there at any point in time? 12:58:31

5 A No. Like I said, I didn't know that 12:58:33  
6 they were there, that I'm aware of. 12:58:36

7 Q Was it your understanding that when 12:58:39  
8 Sullivan|Strickler left on January 7th, that they 12:58:41  
9 had finished the work that they came to do? 12:58:44

10 A Not exactly sure. I remember -- I 12:58:50  
11 remember someone asking me about a scanner. 12:58:54

12 Q Who -- 12:59:00

13 A It would have been after that. And it 12:59:01  
14 may have been -- I would have to go back through 12:59:05  
15 all the text messages I just printed. It could 12:59:10  
16 have been Misty that called me and asked me about 12:59:14  
17 a scanner. 12:59:17

18 Q Did you know that, did you ever learn 12:59:24  
19 that Mr. Lamberg and Mr. Logan were making a video 12:59:26  
20 inside the Coffee County election office? 12:59:30

21 A I'm not aware. 12:59:34

1           Q       Did you know that, did you learn that       12:59:40  
2       when Mr. Lamberg was there at the same time that       12:59:43  
3       an investigator from the Secretary of State was       12:59:47  
4       there? Did you know that?       12:59:50  
5           A       After I read some of the news feeds,       12:59:53  
6       yes, but not at the time. I did not know that.       12:59:55  
7                   MR. BROWN: If you would pull up       01:00:08  
8       Exhibit 33 and mark that as 15.       01:00:10  
9                   (Voyles Deposition Exhibit No. 15 was       01:00:16  
10       marked for identification.)       01:00:16  
11                  MR. BROWN: This will need to load up.       01:00:33  
12       Hang on a second.       01:00:35  
13                  MS. MARKS: Bruce, which tab did you       01:00:53  
14       say?       01:00:55  
15                  MR. BROWN: 33.       01:00:56  
16                  MS. MARKS: That will take a minute to       01:01:00  
17       load because it is big.       01:01:03  
18                  MR. GRUBMAN: Okay, we got it.       01:01:54  
19                  MR. BROWN: If you would, turn to       01:01:56  
20       Page 106 of that pdf.       01:01:58  
21                  MR. GRUBMAN: All right.       01:02:57

1	BY MR. BROWN:	01:03:02
2	Q If you look at the bottom, the shaded	01:03:02
3	messages, are those from you or from Ms. Latham?	01:03:04
4	A I think those are from me.	01:03:26
5	Q And do you recall when you were	01:03:29
6	producing the documents seeing the e-mail that you	01:03:34
7	sent to Ms. Latham around the 15th?	01:03:37
8	A I don't remember finding that e-mail	01:03:41
9	or if I did or did not.	01:03:42
10	Q If you would, scroll down to Page 109.	01:03:53
11	A Yes, sir.	01:04:19
12	Q The exchange, I think Ms. Latham says	01:04:19
13	can you send me the lawsuit from SOS about Coffee.	01:04:22
14	Do you see that?	01:04:30
15	A Yes, sir.	01:04:31
16	Q Do you recall what she was talking	01:04:32
17	about?	01:04:34
18	A At this point I don't.	01:04:35
19	Q Do you know if that was the Shawn	01:04:37
20	Still lawsuit against Coffee County?	01:04:40
21	A I don't know.	01:04:42

1           Q       On the next page she referenced, "I       01:04:43  
2       also sent you a recording of what SOS said about       01:04:51  
3       Coffee," I think, "at today's hearing."       01:04:55  
4                   Do you see that?       01:04:59  
5           A       Yes.       01:05:01  
6           Q       And you say that you have been       01:05:01  
7       watching it most. Do you recall what that was       01:05:04  
8       about?       01:05:07  
9           A       Oh, gosh. I don't recall what it was.       01:05:09  
10       It has been a while.       01:05:15  
11          Q       Next she says, "Shawn is an amazing       01:05:21  
12       guy. Wow. I didn't know he was part of this. He       01:05:25  
13       is trying so hard to get to the bottom of this,"       01:05:28  
14       exclamation mark.       01:05:32  
15                   Do you see that?       01:05:35  
16          A       I do see that.       01:05:36  
17          Q       That would have been Shawn Still,       01:05:43  
18       right?       01:05:45  
19          A       I don't know. I assume it would be       01:05:45  
20       from now, from our conversations today.       01:05:47  
21          Q       And do you know him?       01:05:50



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1	copy of suit today."	01:07:28
2	Do you see that?	01:07:32
3	A I do.	01:07:32
4	Q Did you ever receive a copy of that	01:07:33
5	lawsuit?	01:07:35
6	A I don't recall receiving it.	01:07:36
7	Q Do you know if it ever happened?	01:07:38
8	A You mean if I received it?	01:07:41
9	Q No. If the Trump lawyer ever filed a	01:07:43
10	suit suing the Secretary of State in Coffee	01:07:46
11	County.	01:07:50
12	A Oh, I have no idea.	01:07:50
13	Q If you turn to Page 123 --	01:08:01
14	A Yes, sir.	01:08:07
15	Q -- my question there is that that	01:08:08
16	appears to be the last text message to Cathy	01:08:23
17	Latham.	01:08:26
18	Do you see that?	01:08:27
19	A Yes, sir.	01:08:28
20	Q And do you recall finding newer ones	01:08:29
21	after May 13?	01:08:34

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1           A       I don't think so. I think I gave you 01:08:37  
2       everything that I could find that was relevant 01:08:38  
3       that, within the date ranges you gave me. Not 01:08:43  
4       even relevant but every single thing. 01:08:46

5           Q       Okay. 01:08:49  
6                    If you would scroll down to Page 133. 01:09:05

7           A       Yes, sir. 01:09:23

8           Q       These are text messages between you 01:09:23  
9       and Misty Hampton; is that correct? 01:09:25

10          A       Yes, sir. 01:09:28

11          Q       If you look at the, sort of toward the 01:09:30  
12       top on November 19th, 2020 you reference 01:09:33  
13       votergeorgia.org. 01:09:41

14                   Do you see that? 01:09:44

15          A       Yes, sir, I do. 01:09:45

16          Q       It is your recollection that is 01:09:46  
17       Garland Favorito's organization or his e-mail 01:09:48  
18       address? 01:09:53

19          A       Correct. 01:09:54

20          Q       And you encouraged Ms. Latham to call 01:09:54  
21       him; is that right? 01:09:58

1 A Misty? 01:10:01

2 Q I'm sorry, Misty. Yes. My bad. 01:10:02

3 A Well, she said, "I so want to talk to 01:10:20  
4 this guy." so I said yes, call him. 01:10:21

5 Q And do you recall what the purpose of 01:10:24  
6 communicating with Mr. Favorito was at that time? 01:10:26

7 A Oh, boy. I'm sure it was about the 01:10:31  
8 election data and all that stuff. I don't know 01:10:37  
9 the particular details, though. 01:10:41

10 Q And do you recall him telling you, and 01:10:43  
11 I don't mean you specifically, it might have been 01:10:46  
12 in a group text or something, that Dominion's 01:10:50  
13 software had been accessed in other states, like 01:10:54  
14 in Michigan and maybe out west. Do you recall 01:10:57  
15 that? 01:11:00

16 A It very well might be there but I 01:11:03  
17 don't remember it at this point. 01:11:05

18 Q Right. Do you recall discussions 01:11:06  
19 amongst you all to the effect that well, if these 01:11:08  
20 other states are getting copies of Dominion 01:11:13  
21 software we should get it here in Georgia? 01:11:17



1        says, "Breaking: Trump team now has a Dominion        01:14:48  
2        machine from Ware County, Georgia with evidence of        01:14:53  
3        Trump votes being switched to Biden."        01:14:56  
4                    Do you see that?        01:14:59  
5            A        I do see that.        01:15:00  
6            Q        Do you know anything more about that        01:15:01  
7        incident than what is shown here?        01:15:04  
8            A        There should be some more text that        01:15:09  
9        responds to it, I would imagine, because before I        01:15:13  
10       sent that to anyone I wanted to know if it was        01:15:18  
11       correct or not.        01:15:21  
12            Q        Did you figure it out one way or the        01:15:22  
13       other?        01:15:24  
14            A        I don't recall.        01:15:26  
15            Q        If you go down to Page 158 on December        01:16:08  
16       7th, do you see where she says, "I know you are        01:16:19  
17       probably asleep but I just e-mailed you what I'm        01:16:22  
18       sending to the attorney and wanted you to read it        01:16:27  
19       first."        01:16:29  
20                    Do you see that?        01:16:30  
21            A        I do see that.        01:16:31

1 Q Do you recall what that was about? 01:16:32

2 A I don't remember. I know she was -- I 01:16:36

3 don't remember what it was but I know I just 01:16:41

4 corrected a couple of little errors in syntax or 01:16:44

5 spelling or something on it and sent it right back 01:16:47

6 to her. 01:16:50

7 Q And what was it about? 01:16:51

8 A I would have to pull up that document 01:16:53

9 or find that document and try to read it to 01:16:54

10 remember. 01:16:57

11 Q Do you recall seeing it when you were 01:16:58

12 collecting the documents that you produced? 01:17:03

13 A Yes, sir. Just in passing I do 01:17:06

14 remember. 01:17:08

15 Q Okay. Bear with me. I'm trying to 01:17:09

16 finish this as fast as I can. 01:17:22

17 A Okay. 01:17:24

18 Q I think I know the answer to this. 01:17:25

19 Let me ask it anyway. On Page 162, December 8, 01:17:27

20 the Robert that you refer to is Robert Preston, or 01:17:31

21 that she refers to is Robert Preston; is that 01:17:35

1 right? 01:17:40

2 A I'm pretty sure that would be correct. 01:17:40

3 Q And then on Page 163, the top message 01:17:57

4 from you, it says, "Since Robert, Dominic called 01:18:01

5 like you had and he wants to come maybe five if we 01:18:05

6 can get Eric and Matthew." 01:18:10

7 Do you see that? 01:18:14

8 A I do see that. 01:18:15

9 Q And that's Robert Preston; is that 01:18:16

10 correct? 01:18:18

11 A It would be, I'm quite sure. 01:18:19

12 Q And then who is Dominic? 01:18:21

13 A LaRicca. 01:18:24

14 Q And who is he? 01:18:26

15 A He was our state representative at 01:18:29

16 that point. 01:18:31

17 Q And Eric would be Eric Chaney? 01:18:34

18 A Yes, sir. 01:18:37

19 Q And Matthew is the board member; is 01:18:37

20 that right? 01:18:40

21 A I would imagine that's who, yeah, 01:18:41

1 McCullough. 01:18:44

2 Q And can you recall what you were 01:18:49

3 meeting about? 01:18:52

4 A No, sir, I don't. 01:18:53

5 Q On Page 166 there is a clipping from 01:19:20

6 WALB. 01:19:23

7 Do you see that? Secretary of State 01:19:24

8 opens investigation into how Coffee County handled 01:19:27

9 recount. 01:19:30

10 Do you see that? 01:19:31

11 A I do. 01:19:32

12 Q And I can't quite tell what the date 01:19:33

13 of the text is. Hang on one second. Sometime 01:19:35

14 before December 10th. 01:19:40

15 Do you recall discussing the Secretary 01:19:43

16 of State opening the investigation, just 01:19:45

17 generally? 01:19:47

18 A Generally? 01:19:55

19 Q Yes. 01:19:57

20 A With whom? 01:19:58

21 Q Well, the Secretary of State in 01:20:00

1 December was -- said it was opening an 01:20:01  
2 investigation into Coffee County, right? 01:20:05  
3 A Um-hmm. 01:20:07  
4 Q And do you recall what they did 01:20:08  
5 pursuant to that investigation, if anything? 01:20:09  
6 A Well, pretty sure they sent 01:20:18  
7 representatives there. 01:20:22  
8 Q And did you meet, did you meet with 01:20:24  
9 them? 01:20:27  
10 A No, sir. 01:20:28  
11 Q Do you know what they did when they 01:20:31  
12 were there? 01:20:32  
13 A I'm trying to remember. I know there 01:20:36  
14 was some investigators came to go through, I'm 01:20:42  
15 assuming they recounted the ballots. I'm pretty 01:20:49  
16 sure, if this is that particular time, that they 01:20:54  
17 counted all the ballots by hand. And Tony Rowell, 01:20:56  
18 I see his name down there lower on the page, he 01:20:58  
19 would have kind of orchestrated that whole 01:21:03  
20 counting. 01:21:07  
21 Q So that was the third count I guess, 01:21:08

1 the one that finally led to certification; is that 01:21:11

2 right? 01:21:15

3 A Geez, I don't remember which count it 01:21:16

4 would have been. I'm not sure. 01:21:18

5 Q If you look at Page 172 you will see a 01:21:30

6 reference to DOJ. Do you know what that is about? 01:21:44

7 A I really don't. I really don't 01:21:56

8 remember what that is about. I'm assuming they 01:21:59

9 would have called me since she told me about it. 01:22:09

10 I'm not -- I can only speculate there. I don't 01:22:12

11 know. 01:22:16

12 Q Scroll down to 174. You will see what 01:22:19

13 looks like a screen shot of a text from Cathy. 01:22:26

14 Do you see that? 01:22:31

15 A I do. I can see -- 01:22:32

16 Q Do you recall -- 01:22:32

17 A I can only see one side of the 01:22:32

18 conversation. 01:22:39

19 Q Do you recall what that was about? 01:22:42

20 A I'm sorry, I don't. 01:22:46

21 Q If you scroll down to Page 178 -- 01:23:21

1 A Yes, sir. 01:23:31

2 Q -- Ms. Hampton said, "If they were to 01:23:32

3 come after me personally Tony would not be able to 01:23:34

4 represent me because he represents the county," 01:23:38

5 correct? 01:23:40

6 Do you see that? 01:23:42

7 A Yes, sir. 01:23:43

8 Q Do you know who Ms. Hampton was 01:23:44

9 concerned was coming after her? 01:23:47

10 A I'm not sure. I'm wondering if this 01:23:56

11 might have been after the investigators, the state 01:23:58

12 investigators were there. It's hard without the 01:24:01

13 context to know that point in time exactly. 01:24:09

14 Q The next page is 179. There is a -- 01:24:14

15 A Yes, sir. 01:24:19

16 Q You say, "That is awesome to have a 01:24:20

17 backup plan." Just read your text and then let me 01:24:24

18 know what that was about. 01:24:28

19 A Well, when I read down there about 01:24:46

20 Tony almost wants the SOS to start something, it 01:24:48

21 must have been about them coming and everything 01:24:52

1       they were doing. I don't know where that -- where       01:24:55  
2       she got that law firm there from. I guess she was       01:24:58  
3       looking for someone else -- up there didn't she       01:25:09  
4       say she wasn't sure -- and I told her I think if       01:25:12  
5       it was in your capacity as a county employee, he       01:25:17  
6       would have to -- and I think we are talking about       01:25:21  
7       represent her there.       01:25:24

8               Q       If you look at Page 185 at the top do       01:25:36  
9       you see the quote from TheSharpEdge Arizona?       01:25:39

10              Do you see that?       01:25:53

11             A       Yes, sir.       01:25:54

12             Q       You see where reference was made that       01:25:54  
13       there was going to be a full forensic audit in       01:25:55  
14       Arizona.       01:26:05

15              Do you see that?       01:26:06

16             A       I do.       01:26:11

17             Q       And is that where you all got the idea       01:26:14  
18       to make a copy of the Coffee County election       01:26:17  
19       system, from the work that was being done in       01:26:22  
20       Michigan and Arizona?       01:26:24

21             A       You all?       01:26:32

1 Q Well, Coffee County. 01:26:35

2 A I can't -- I don't know. I don't know 01:26:37

3 what -- I don't know. 01:26:39

4 Q If you go down to Page 212. 01:27:10

5 A Okay. 01:27:38

6 Q If you look at January 7 at 6 a.m. you 01:27:38

7 text Ms. Hampton, "Finally talked to Eric later 01:27:43

8 last night. He has new employee starting this 01:27:51

9 a.m. and said he could meet me there at 11." 01:27:54

10 Do you see that? 01:27:59

11 A Yes, sir. 01:28:00

12 Q Was that to meet at the county 01:28:00

13 elections office? 01:28:03

14 A I would assume that is correct. 01:28:05

15 Q And then Ms. Hampton says, "Did y'all 01:28:06

16 discuss what I am doing today?" 01:28:12

17 Do you see that? 01:28:15

18 A I do. 01:28:16

19 Q And at that time you knew what she was 01:28:17

20 going to be doing on the 7th, correct? 01:28:19

21 A My response is no so I would say I did 01:28:22

1 not. 01:28:26

2 Q If you did not you would say what are 01:28:27  
3 you talking about. 01:28:29

4 A It was a question. 01:28:30

5 MR. GRUBMAN: Hold on. Hold on. Hold 01:28:31  
6 on. 01:28:33

7 Mr. Brown, that was not an appropriate 01:28:34  
8 question. That was you arguing, badgering the 01:28:38  
9 witness and making a closing argument. So why 01:28:41  
10 don't you repeat that question in a form that's an 01:28:45  
11 appropriate question for a witness. 01:28:45

12 MR. BROWN: I think it's appropriate 01:28:45  
13 but let me ask it a different way. 01:28:48

14 MR. GRUBMAN: Okay. 01:28:52

15 BY MR. BROWN: 01:28:53

16 Q The question was, did you discuss with 01:28:53  
17 Eric, right? Isn't that the question? 01:28:55

18 A The question says did you all discuss 01:28:59  
19 what I'm doing today and my answer was no. 01:29:01

20 Q And at that time did you know what she 01:29:05  
21 was doing that day? 01:29:08

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1	A	My answer was no.	01:29:11
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2	Q	Your answer was no to the question of	01:29:20
---	---	---------------------------------------	----------

3           whether you and Eric discussed it.                                 01:29:23

4	A	If I had known, wouldn't I say yes?	01:29:27
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5 |           Q      Well --                                01:29:29
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6	THE WITNESS: Sorry.	01:29:31
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7 MR. GRUBMAN: Hold on. I'm talking to 01:29:33

8 | him. I understand that Mr. Brown's tone and 01:29:34

9 | demeanor could be off-putting but you have to do 01:29:38

10 | your best not to argue with him. Let me do that. 01:29:42

11 You see I have done a good job of that because he 01:29:45

12 does not intimidate me with that type of question, 01:29:49

13	and you just answer the question, okay? That's	01:29:51
----	--	----------

14	why you pay me. I'll do that.	01:29:51
----	-------------------------------	----------

15	You can repeat that question,	01:29:53
----	-------------------------------	----------

16	Mr. Brown.	01:29:54
----	------------	----------

17 MR. BROWN: I was just pausing to 01:29:56

18	reflect on your statement.	01:29:57
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19 MR. GRUBMAN: Yes, I hope you do. 01:30:01

20 This way you can hopefully make this move a little 01:30:02

21	quicker moving forward.	01:30:05
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1 MR. BROWN: I'm learning a lot, 01:30:08

2 Mr. Grubman. 01:30:10

3 MR. GRUBMAN: Good. 01:30:13

4 BY MR. BROWN: 01:30:14

5 Q There is two issues here. I'm not 01:30:15

6 suggesting this is hugely important but let me 01:30:19

7 finish this up. There is two issues here. The 01:30:20

8 first is whether you talked with Eric about what 01:30:22

9 Misty was doing and your answer was no, correct? 01:30:26

10 MR. GRUBMAN: Go ahead. 01:30:33

11 A I would say that is correct. 01:30:38

12 Q Did you, apart from talking to Eric 01:30:41

13 about it, did you know what Ms. Hampton was doing? 01:30:45

14 A I knew she was meeting with Scott 01:30:48

15 Hall. 01:30:50

16 Q Is that all you knew about what she 01:30:52

17 was doing that day? 01:30:55

18 A That's all I recollect knowing at this 01:30:56

19 point. 01:30:58

20 Q Then at 9 a.m. that morning she texts 01:31:07

21 you, "The people are almost in Douglas." 01:31:10

1 Do you see that? 01:31:17

2 A I do. 01:31:18

3 Q "The guy, Scott Hall, has landed." 01:31:18

4 Do you see that? 01:31:21

5 A Yes, sir. 01:31:23

6 Q And you say, "Okay, can we call this 01:31:23

7 girl to see what she really wants?" 01:31:26

8 Do you see that? 01:31:28

9 A Yes, I do. 01:31:29

10 Q Who is that girl? 01:31:30

11 A I have no idea what that is. I don't 01:31:32

12 know. 01:31:34

13 Q And can you -- I just can't read. I'm 01:31:36

14 not suggesting that there is anything to it, but 01:31:39

15 can you read the, I guess it is the screen shot 01:31:44

16 right beneath that. 01:31:47

17 A I can see it but I can't tell 01:31:49

18 anything. Tommy somebody, something about CBD or 01:31:52

19 something. I can't ... 01:31:58

20 Q Then on the 13th it looks like you 01:32:21

21 were Signaling with Misty Hampton, is that 01:32:24

1 correct, sending messages by Signal? 01:32:28

2 A What page is that? 01:32:33

3 Q I'm sorry, it's Page 215. 01:32:34

4 A Yes, sir. 01:32:37

5 Q And she says, "Check Signal." 01:32:41

6 Do you see that? 01:32:44

7 A I do see that. 01:32:44

8 Q And at or about this time were you 01:32:45

9 using Signal to communicate with Misty from time 01:32:47

10 to time? 01:32:50

11 A I must have downloaded it. I don't 01:32:51

12 really recall ever using it. If I did, it wasn't 01:32:56

13 very much. 01:33:01

14 Q Do you know what she was referring to 01:33:06

15 on January 19 when she says, "Please pray right 01:33:08

16 now that the truth will be found"? 01:33:12

17 MR. GRUBMAN: Objection, calls for 01:33:17

18 speculation. 01:33:18

19 A I don't know. 01:33:20

20 Q Did you have an understanding at the 01:33:30

21 time why Ms. Hampton needed a scanner, if you look 01:33:32

1 down at the bottom of Page 215? 01:33:37

2 A For whatever she was scanning in the 01:33:52

3 office. I'm not exactly sure at this point. 01:33:55

4 Q She was scanning ballots; is that 01:33:58

5 right? 01:34:00

6 A I don't know. I wasn't there when she 01:34:01

7 was scanning. 01:34:03

8 Q If you go down to Page 222, who is TJ? 01:34:16

9 Do you know? 01:34:24

10 A What is his last name? He was -- is 01:34:32

11 it TJ Hall? I can't exactly remember but he was 01:34:34

12 going to -- he was interested in running for 01:34:39

13 Secretary of State. 01:34:44

14 Q Okay. 01:34:45

15 A He was one of the county -- 01:34:46

16 Q Is it TJ Hudson? 01:34:48

17 A Hudson, that's it. 01:34:51

18 Q He was going to run for Secretary of 01:34:52

19 State? 01:34:54

20 A I think that was what all this was 01:34:55

21 about. I believe so. 01:34:58

1           Q       On Page 227 she says to you on the       01:35:26  
2       24th, "I'm on the phone with chairman of the       01:35:33  
3       government oversight, Mr. Harbin."       01:35:41  
4                    Do you see that?       01:35:44  
5           A       Yes, sir.       01:35:45  
6           Q       And that's -- is that some state       01:35:46  
7       oversight committee?       01:35:50  
8           A       I'm thinking this was during the time       01:35:53  
9       they were rewriting a bunch of the laws.       01:35:57  
10          Q       The Georgia legislature?       01:36:09  
11          A       Yes, sir.       01:36:12  
12          Q       Okay.       01:36:12  
13          A       I'm thinking that's what that was all       01:36:12  
14       about.       01:36:14  
15          Q       And the inquiry from Harbin might have       01:36:15  
16       related to the changes to the election laws?       01:36:18  
17          A       That would be my best guess.       01:36:23  
18          Q       Do you recall what the big news was       01:36:28  
19       that she was going to convey to you that day?       01:36:30  
20          A       No, sir, I don't. There's no telling.       01:36:33  
21          Q       If you go to the next page, on       01:36:47

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1	Page 228.	01:36:50
2	A Yes, sir.	01:36:51
3	Q You see there is a reference to --	01:36:51
4	there is a screen shot of a message from Curt	01:36:55
5	Olsen.	01:36:57
6	Do you see that?	01:37:00
7	A I do see it.	01:37:00
8	Q And Curt Olsen is the lawyer for Mike	01:37:02
9	Lindell, did you know that?	01:37:07
10	A I did not.	01:37:11
11	Q You know who Mike Lindell is?	01:37:12
12	A Yes, sir. The pillow --	01:37:17
13	Q The MyPillow guy?	01:37:18
14	A Yes, sir.	01:37:21
15	Q Were you aware of contacts between	01:37:21
16	Misty Hampton directly or indirectly with	01:37:24
17	Mr. Lindell?	01:37:27
18	A I knew there was one where I think she	01:37:30
19	was going to talk to her or meet her about the	01:37:36
20	possibility of hiring her at one point.	01:37:38
21	Q Hiring her to work at MyPillow?	01:37:46



1           A       All I know is that he was going to       01:38:57  
2       meet with her and I thought it was about hiring       01:39:00  
3       her. I don't know. Other than that, that's       01:39:02  
4       pretty much all I know.       01:39:05

5           Q       And who told you that it was about       01:39:07  
6       hiring her?       01:39:09

7           A       I thought Misty did. She may not       01:39:10  
8       have, but that's the best of my recollection.       01:39:13  
9       That's what I remember.       01:39:15

10          Q       And so Mr. Lindell flew in from       01:39:17  
11       Mar-a-Lago on his private jet to Douglas to speak       01:39:21  
12       with Misty Hampton about hiring her; is that       01:39:26  
13       right?       01:39:28

14          A       I don't --       01:39:29

15               MR. GRUBMAN: Hold on.       01:39:31

16               Objection, assumes facts not in       01:39:31  
17       evidence, and I will note for the record, I am       01:39:33  
18       sure Mr. Brown will disagree, but based on all the       01:39:35  
19       answers thus far he knows pretty well that       01:39:38  
20       Mr. Voyles had absolutely no clue what jet the CEO       01:39:43  
21       of mypillow.com flew in and where he flew from.       01:39:47

1 But if you do know you are more than 01:39:51  
2 welcome to answer. 01:39:54  
3 Q Do you know where he flew in from? 01:39:55  
4 A No, sir, I don't know. 01:39:58  
5 Q And tell me everything that Misty told 01:40:00  
6 you about Mr. Lindell. 01:40:02  
7 A Pretty much I have already told you. 01:40:06  
8 I don't remember anything else. 01:40:08  
9 Q Did you talk with anyone else about 01:40:09  
10 Mr. Lindell being in Douglas on the 24th or 25th? 01:40:13  
11 A No. 01:40:18  
12 Q I may have asked this and I apologize, 01:40:19  
13 you didn't talk to Mr. Lindell or anyone else 01:40:23  
14 associated with Mr. Lindell, did you? 01:40:26  
15 A No, sir. 01:40:28  
16 Q All right, and then in the same page, 01:40:33  
17 on Page 228-229 you spoke with Misty about her 01:40:40  
18 termination, correct? 01:40:45  
19 A Yes, sir. 01:40:47  
20 Q I believe you testified to that 01:40:48  
21 before. 01:40:49

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1 A Yes, sir. 01:40:50

2 Q And then you congratulate her on 01:41:05

3 getting a new job, right? 01:41:08

4 A Where is that? 01:41:12

5 Q That's the next page. 01:41:13

6 A Yes. 01:41:23

7 Q Let me direct you to Page 232. 01:41:52

8 A Yes, sir. 01:41:57

9 Q Focus on your text to Misty. It says, 01:42:05

10 "Garland Favorito left me message asking what the 01:42:08

11 deal is with you. I believe he thinks Dominion 01:42:12

12 threatening lawsuits pushed county to ask for your 01:42:16

13 resignation. Would you like to call him to 01:42:20

14 control narrative?" 01:42:24

15 Do you see that? 01:42:27

16 A Yes, sir, I see it. 01:42:28

17 Q Did Mr. Favorito indicate in his 01:42:41

18 message or in any other way what the basis was for 01:42:45

19 his belief that Dominion's threatening lawsuits 01:42:50

20 pushed the county to ask for Ms. Hampton's 01:42:51

21 resignation? 01:42:51

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1           A       Basis? I don't know. I obviously       01:42:55

2       felt that he thought that was a component but I       01:42:59

3       don't know.       01:43:02

4           Q       But you don't know if he was just       01:43:03

5       making that up or he had some information or what,       01:43:05

6       right?       01:43:08

7           A       I don't know.       01:43:09

8           Q       Did you ever learn anything more after       01:43:09

9       this period of time about Dominion threatening a       01:43:11

10      lawsuit relating to Misty Hampton's resignation?       01:43:15

11          A       Not that I'm aware of, no.       01:43:20

12          Q       Not that you recall?       01:43:23

13          A       No. That's correct.       01:43:24

14          Q       Let me direct you to Page 240.       01:44:19

15          A       Yes, sir.       01:44:28

16          Q       Did Mr. Favorito ever do a Podcast       01:44:29

17      about Misty Hampton, to your knowledge?       01:44:33

18          A       I don't know.       01:44:37

19          Q       Beginning at Page 243, these are texts       01:45:09

20      between you and Eric Chaney; is that correct?       01:45:15

21          A       Yes, sir. It appears that way, yes.       01:45:23

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1           Q       Bear with me. I'm trying to find the       01:46:29  
2       dates on some of these. Some of these strings are       01:46:31  
3       pretty long.   01:46:35  
4           A       Yes, I agree.                               01:46:37  
5           Q       If you look on Page 252, I believe       01:46:39  
6       it's a text dated November 18, if you scroll up.       01:46:45  
7       That looks like the last date.                       01:46:48  
8           A       252?                                       01:46:50  
9                   MR. GRUBMAN: You can see the last       01:47:01  
10       date up here.                                       01:47:02  
11                   Do you see that?                       01:47:03  
12                   THE WITNESS: Oh, yes.                   01:47:05  
13           A       Yes.                                       01:47:06  
14           Q       And you say I just sent to both       01:47:08  
15       Dominic -- I'm sorry, just sent to Dominic --       01:47:14  
16       strike that.                                       01:47:14  
17                   "Just sent both to Dominic and said I       01:47:15  
18       want Vernon as my rep. Go get minutes of Coffee       01:47:16  
19       election board. Open your eyes. Now I bet you he       01:47:22  
20       ignores me."                                       01:47:26  
21                   What were you referring to?           01:47:28

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1 A The video above. 01:47:33

2 Q And what video was that? 01:47:40

3 A The one that says Georgia State Rep 01:47:42

4 Exposes Massive Election Fraud. Those were just, 01:47:46

5 they are sensational headlines. I just had told 01:47:49

6 Dominic I think I would prefer to have him as my 01:47:53

7 rep instead of Dominic just because he was taking 01:48:02

8 action. 01:48:05

9 Q Wait. Who would you prefer as your 01:48:06

10 representative? 01:48:09

11 A I think it's Vernon Jones in that 01:48:09

12 thing. 01:48:12

13 Q Okay. 01:48:13

14 Let me direct your attention to 01:48:30

15 Page 254. 01:48:32

16 A Yes, sir. 01:48:34

17 Q You said, "I did an open records 01:48:36

18 request last week and watched video that Misty did 01:48:39

19 showing how ballots could be scanned multiple 01:48:43

20 times and changed during adjudication." 01:48:46

21 Do you see that? 01:48:50

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1	A	Yes. That is Dominic.	01:48:51
---	---	-----------------------	----------

2	Q	And then you say my eyes are wide	01:49:00
---	---	-----------------------------------	----------

3	open?	01:49:02
---	-------	----------

4	A	That's not -- that is, I copied what	01:49:03
---	---	--------------------------------------	----------

5 | Dominic sent me and that's what that is. 01:49:06

6	Q	I see. This is a copy of what Dominic	01:49:09
---	---	---------------------------------------	----------

7 | said, not what you said, correct? 01:49:13

8	A	Correct.	01:49:15
---	---	----------	----------

9	Q	And do you know what Dominic was	01:49:16
---	---	----------------------------------	----------

10 referring to when he says, "We are ready to 01:49:18

11	action."	01:49:21
----	----------	----------

12	A	I don't.	01:49:23
----	---	----------	----------

13	Q	If you go to 255 at the bottom --	01:49:38
----	---	-----------------------------------	----------

14	A	Yes, sir.	01:49:43
----	---	-----------	----------

15	Q	-- you say, "We are meeting again	01:49:43
----	---	-----------------------------------	----------

16	Friday to discuss our options on changes including	01:49:45
----	--	----------

17 voting machines and mail-in ballots." 01:49:50

18	A	Again, that's once again, that's	01:49:53
----	---	----------------------------------	----------

19	Dominic, a copy of what Dominic sent me. During	01:49:55
----	---	----------

20	this point in time I'm on his case on text	01:49:58
----	--	----------

21	messages and phone calls urging him to work on	01:50:03
----	--	----------

1 election issues, like early voting, mail-in 01:50:13  
2 ballots, all those kinds of things, opening 01:50:16  
3 mail-in ballots early, which I totally disagree 01:50:21  
4 with. So we were going over all those types of 01:50:24  
5 things at this point in time. 01:50:28

6 Q How can you -- I'm not doubting you at 01:50:33  
7 all, I'm just looking at a piece of paper. How 01:50:36  
8 can you tell that that is a quote from Dominic. 01:50:39  
9 Is it the font or that color? 01:50:42

10 A I'm just pretty sure I wouldn't have 01:50:55  
11 written it. 01:50:57

12 Q I see. 01:50:58

13 A Because I don't know the legal 01:51:08  
14 advisors to the governor, Loeffler or Perdue. 01:51:10

15 Q If you look at Page 276, you see where 01:52:28  
16 you texted Chris Harvey's November 17th, 2020 01:52:31  
17 message to Eric Chaney? 01:52:35

18 Do you see that? 01:52:36

19 A 27 ... 01:52:37

20 Q 276. 01:52:41

21 A I do. 01:52:46

1 Q Why did you do that at that time? 01:52:47

2 A I have no clue. 01:52:49

3 Q If you look on Page 288, do you see a 01:53:29

4 forward, I guess, from Eric Chaney? It says, 01:53:35

5 "Board members, I was unable to get information 01:53:42

6 from the Secretary of State's office that I 01:53:45

7 wanted." 01:53:47

8 Do you know if Mr. Chaney was the 01:53:48

9 author of that or who was? 01:53:51

10 A I'm not sure. 01:54:08

11 Q I'm just curious. On 289, what is 01:54:16

12 that a picture of? 01:54:20

13 A It looks like the first frame in a 01:54:29

14 video. 01:54:32

15 Q Do you know what the video was about? 01:54:35

16 A I think it's in Eric's truck and I 01:54:37

17 think we had ridden through where the election was 01:54:40

18 and it was, you know, people had signs and things 01:54:49

19 like that out. I think that's -- I would have to 01:54:55

20 go back and play it to tell you. 01:54:59

21 Q If you go down to 294 -- 01:55:44

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1	A	Yes, sir.	01:55:51
2	Q	-- this is on January 7 at 7 p.m.	01:55:52
3		Do you see that?	01:55:55
4	A	Yes, sir.	01:55:56
5	Q	Mr. Chaney says, "Let's switch to	01:55:57
6		Signal."	01:56:00
7		Do you see that?	01:56:01
8	A	I do.	01:56:02
9	Q	And do you recall what the information	01:56:02
10		was that was being conveyed on Signal?	01:56:05
11	A	No, sir, I don't recall.	01:56:08
12	Q	Was it about Sullivan Strickler's	01:56:09
13		visit that day?	01:56:15
14	A	I do not know.	01:56:17
15	Q	If you go to 297, there is a text	01:56:42
16		dated February 19th.	01:56:47
17	A	Yes, I see that.	01:56:59
18	Q	What lawsuit are you referring to	01:57:01
19		there with Olivia against Misty?	01:57:04
20	A	To the best of my memory Olivia	01:57:12
21		Pearson was voting and there was some issues with	01:57:15

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1 her and the machinery or helping someone vote or 01:57:21  
2 something. There was something she was doing in 01:57:25  
3 there that Misty escorted her out or had her 01:57:27  
4 escorted out or something, and I think she brought 01:57:31  
5 a suit against Misty. I would have to -- 01:57:35

6 Q And who was she? She was a voter? 01:57:39

7 A Yes. She was a voter but she was also 01:57:44  
8 a city commissioner. 01:57:48

9 Q A Douglas city commissioner? 01:57:50

10 A Yes, sir. I think she is still on 01:57:53  
11 there. 01:58:00

12 Q If you go to Page 303, those are texts 01:58:25  
13 with Tony Rowell; is that right? 01:58:36

14 A Yes, sir. 01:58:39

15 Q I can't see the -- 01:58:42

16 A Yes, sir. Yes. 01:58:43

17 Q If you look at the bottom of Page 303 01:59:05  
18 you tell Mr. Rowell, "K headed to election office 01:59:08  
19 to see if it was the same." 01:59:12

20 What were you referring to? 01:59:15

21 A I'm not sure unless it was a recount 01:59:19

1 or something. I don't know. I really don't 01:59:22  
2 remember on that one. 01:59:34  
3 Q Okay. 01:59:36  
4 If you look at the next page, why are 01:59:39  
5 you asking him, "Okay, you be at board meeting 01:59:52  
6 tomorrow at 8:30"? 01:59:57  
7 Do you see that? 01:59:59  
8 A On which page? 02:00:01  
9 Q 306. 02:00:03  
10 A I don't know. Is that the date of the 02:00:15  
11 letter? I don't know. 02:00:16  
12 Q I don't want you to speculate. It's 02:00:25  
13 all right. 02:00:28  
14 A I don't know. 02:00:29  
15 Q On Page 309, Mr. Rowell is talking 02:01:19  
16 about Bob. Do you know who he is referring to 02:01:23  
17 there? 02:01:26  
18 A Bob Schermer, a friend of mine that I 02:01:27  
19 hunt with, and his wife, Tony's wife, Melissa, 02:01:31  
20 family is from Florida and they actually know each 02:01:38  
21 other, so just personal stuff. 02:01:42



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1 Q You don't recall what this is about? 02:04:54

2 A No, sir. 02:04:57

3 Q Do you recall getting a letter from 02:04:59

4 the Secretary of State telling you to release 02:05:01

5 nothing to anyone? 02:05:03

6 A No, sir. 02:05:05

7 Q Or seeing a letter to the county to 02:05:06

8 that effect? 02:05:08

9 A No, sir, I don't. I don't recall 02:05:09

10 that. 02:05:10

11 Q I'm not suggesting that there were 02:06:19

12 any, but looking through this there is no texts 02:06:20

13 between you and Tony in January of 2021. Do you 02:06:23

14 recall any communications with him during that 02:06:27

15 time frame? 02:06:30

16 A No, I don't. I mean, and I -- I 02:06:30

17 screen shotted every single one so there are none 02:06:34

18 that are missing. I guarantee you. 02:06:38

19 Q Okay. I appreciate that. 02:06:41

20 A Yes, sir. 02:06:44

21 Q Okay. 02:07:11

1 MR. BROWN: I'm done with that 02:07:21

2 exhibit, and let's take a ten-minute break if 02:07:22

3 that's all right with you. 02:07:25

4 MR. GRUBMAN: All right, thank you. 02:07:26

5 THE VIDEO OPERATOR: The time on the 02:07:28

6 monitor is 2:07 p.m. and we are off the record. 02:07:29

7 (Recess taken -- 2:07 p.m.) 02:07:34

8 (After recess -- 2:38 p.m.) 02:07:38

9 THE VIDEO OPERATOR: Stand by. 02:38:23

10 The time on the monitor is now 2:39 02:38:47

11 p.m. and we are on the record. 02:38:51

12 MR. BROWN: If we could go back to 02:38:54

13 Exhibit 15, which is the long one. 02:38:57

14 MR. GRUBMAN: We got it. 02:39:04

15 BY MR. BROWN: 02:39:05

16 Q And if you could go to Page, let's 02:39:06

17 see, 106. 02:39:10

18 MR. GRUBMAN: 106? 02:39:12

19 MR. BROWN: Yes. 02:39:14

20 MR. GRUBMAN: All right, hold on. 02:39:15

21 Whoever designs this software should 02:39:21

1 take, I have some suggestions for them after this 02:39:25  
2 is over. 02:39:28  
3 Right, maybe you can type in the page. 02:39:30  
4 I don't know. I haven't figured it out. 02:39:33  
5 MR. BROWN: I haven't either. 02:39:36  
6 MR. GRUBMAN: Seems like a pretty easy 02:39:38  
7 addition for them. 02:39:41  
8 All right, 106. All right, we are 02:39:44  
9 there. 02:39:46  
10 MR. BROWN: Are we back on the record, 02:40:01  
11 Mr. Lawrence? 02:40:03  
12 THE VIDEO OPERATOR: We are on the 02:40:05  
13 record. 02:40:06  
14 BY MR. BROWN: 02:40:07  
15 Q On December 15th, the text message to 02:40:07  
16 Cathy says, "I believe the three Secretary of 02:40:11  
17 State investigators and two Dominion reps that 02:40:12  
18 Preston said were there for vote count should be 02:40:14  
19 included in lawsuit." 02:40:21  
20 What were you referring to? 02:40:22  
21 A I -- I really do not remember. 02:40:28

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1 Q What was the context for your 02:40:34

2 December -- 02:40:36

3 A If I had some more context I could 02:40:38

4 probably recall that, but that is not really 02:40:40

5 related. I don't know. 02:40:48

6 I'm sorry, I don't have an answer. I 02:40:51

7 wish I did. 02:40:55

8 Q Okay. 02:40:56

9 MR. BROWN: If we could mark Tab 31 as 02:41:02

10 Exhibit 16, please. 02:41:05

11 (Voyles Deposition Exhibit No. 16 was 02:41:07

12 marked for identification.) 02:41:07

13 MR. GRUBMAN: All right, we got it. 02:41:29

14 BY MR. BROWN: 02:41:35

15 Q Mr. Voyles, this is an e-mail. We may 02:41:36

16 have seen pieces of this before but bear with me. 02:41:39

17 This is the Found the Memo e-mail, and you will 02:41:44

18 see this one may be the same one that we looked at 02:41:52

19 before. It has a copy of the Chris Harvey memo. 02:41:55

20 Do you see that? 02:42:02

21 MR. GRUBMAN: There is some, as you 02:42:15

1       see, Bruce, he is just pointing out some, like,       02:42:15  
2       those Xs under Garland's name and those are just       02:42:20  
3       things where I think the computer couldn't pick up       02:42:24  
4       the image. Obviously ignore that but review the       02:42:27  
5       rest of it.       02:42:31

6             A       Am I supposed to see the actual memo       02:42:32  
7       or something?       02:42:35

8             Q       Yes.       02:42:39

9             MR. GRUBMAN: If you look, it's the       02:42:41  
10       next page. So go down one more page. Go down.       02:42:43  
11       Keep going. There it is.       02:42:46

12            THE WITNESS: Oh.       02:42:49

13            MR. GRUBMAN: All right.       02:42:51

14            A       Yes. Okay, I see that.       02:42:51

15            Q       Now, what was the concern -- was there       02:42:59  
16       a concern between you and Eric Chaney and       02:43:03  
17       Ms. Hampton about whether Coffee County was in       02:43:09  
18       danger of violating this memo?       02:43:15

19            A       Geez, I do not recall at this time.       02:43:21  
20       I'm sorry. I don't remember what all that was       02:43:23  
21       about.       02:43:26

1           Q       Did Mr. Rowell ever express to you any       02:43:38  
2       concern about Coffee County doing its own forensic       02:43:41  
3       audit?   02:43:46

4           A       I don't know that he and I have ever       02:43:51  
5       had a discussion about any of that.                       02:43:53

6           Q       Do you recall having a conversation       02:43:56  
7       with Ms. Chaney or -- Mr. Chaney or Ms. Latham       02:43:59  
8       about doing a forensic audit in Coffee County?       02:44:05

9           A       I don't have a recollection of it, no.       02:44:09

10          Q       Did you or, to your knowledge, the       02:44:13  
11       others who were there in Coffee County on January       02:44:15  
12       7 in the election office refer to what                   02:44:19  
13       Sullivan|Strickler was doing as a forensic audit?       02:44:23

14          A       I -- not -- geez, I don't remember any       02:44:30  
15       of that, no.   02:44:32

16          Q       Do you remember any discussion about       02:44:34  
17       whether Sullivan|Strickler was there to fix               02:44:36  
18       something that was broken with the system?               02:44:38

19                   MR. GRUBMAN: I have a very good       02:44:46  
20       memory so I am going to object on asked and           02:44:47  
21       answered.   02:44:49

1 But it has been a while, Mr. Voyles, 02:44:49

2 so you can answer if you can. 02:44:53

3 Q Did I get an -- I don't know if I got 02:45:01

4 an answer. 02:45:03

5 A I don't recall any. 02:45:04

6 Q Thank you. Sorry about that. 02:45:05

7 Do you remember sending Chris Harvey's 02:45:13

8 memo to Tony Rowell? 02:45:16

9 A It looks like I did there, but as far 02:45:22

10 as remembering it, I don't. 02:45:24

11 Q So you don't remember why you would 02:45:25

12 have either; is that right? 02:45:28

13 A No, sir, I sure don't. But I see it 02:45:29

14 there that I did. 02:45:34

15 MR. BROWN: If we could make Tab 20. 02:45:38

16 MR. GRUBMAN: 17, right? 02:45:41

17 THE REPORTER: I think you mean 17. 02:45:54

18 MR. BROWN: 17, thank you. 02:45:57

19 (Voyles Deposition Exhibit No. 17 was 02:45:58

20 marked for identification.) 02:45:58

21 MR. GRUBMAN: There you go. We got 02:46:32

1 it. 02:46:33

2 BY MR. BROWN: 02:46:33

3 Q I'm not sure this is the right exhibit 02:46:50

4 for this, but do you recall the board discussing 02:46:53

5 or do you recall learning that the board, in 02:46:55

6 February of 2021, discussing threatened litigation 02:46:58

7 against Coffee County? 02:47:03

8 A I don't. 02:47:06

9 Q Did you know of any threatened 02:47:14

10 litigation against Coffee County in February of 02:47:17

11 2021? 02:47:20

12 A Not that I'm aware of. I just don't 02:47:22

13 recall any. 02:47:27

14 Q I may have asked you about e-mails and 02:47:33

15 things like that but let me ask you again about 02:47:36

16 Garland Favorito. Did you ever talk to 02:47:39

17 Mr. Favorito about doing a forensic audit in 02:47:43

18 Coffee County? 02:47:47

19 A I don't believe so. 02:47:48

20 Q Do you recall having discussions with 02:47:49

21 him in general? 02:47:51

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1 A Yes. Yes. 02:47:53

2 Q And -- 02:47:57

3 A I mean, other discussions, what they 02:47:58  
4 were about ... 02:48:01

5 Q Did you talk with him about what you 02:48:03  
6 could do in Coffee County? 02:48:05

7 A What do you mean what you can do? 02:48:07

8 Q What actions you can take in Coffee 02:48:10  
9 County in terms of investigation or lawsuit or 02:48:12  
10 anything like that. 02:48:14

11 A I'm not sure I really understand the 02:48:16  
12 question. 02:48:18

13 Q Mr. Favorito was in Atlanta, right, 02:48:18  
14 and he was pursuing litigation in Atlanta, 02:48:21  
15 correct? 02:48:25

16 A Yes. I know he did. 02:48:25

17 Q And did you have any discussions with 02:48:27  
18 him about Coffee County's election system? 02:48:29

19 A I think -- I think my discussions with 02:48:34  
20 him were more along the lines of the spreadsheet 02:48:37  
21 that we looked at earlier. You know, the numbers 02:48:40

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1 not being the same. Oh, geez, I don't -- as far 02:48:44

2 as litigation, I don't think so. 02:48:50

3 Q Did you have any discussions with 02:48:52

4 Mr. Favorito about the possibility of making 02:48:53

5 copies or forensic copies of the Coffee County 02:48:57

6 system? 02:49:00

7 A I don't think so. 02:49:01

8 Q If you can go back to, this is 02:49:06

9 skipping back a little bit, but Coffee County was 02:49:07

10 the last county to certify the 2020 election, 02:49:12

11 correct? 02:49:15

12 A Okay. 02:49:17

13 Q I mean, you recall that as being the 02:49:18

14 case? 02:49:20

15 A I think it was because I think I 02:49:22

16 remember seeing some stuff on television about 02:49:24

17 that, like Gabriel or somebody. 02:49:29

18 Q You recall discussion about why Coffee 02:49:34

19 County didn't just simply immediately count the 02:49:36

20 ballots by hand when it was having all those 02:49:41

21 scanner problems? 02:49:46

1           A       Oh, I -- no, I don't recall discussing     02:49:47  
2       about it.   02:49:50

3           Q       Were you aware of whether                 02:50:06  
4       Sullivan|Strickler copied images from the January     02:50:08  
5       6th election?   02:50:13

6           A       I don't know exactly what they were.     02:50:16  
7       No, I don't know.                                       02:50:18

8           Q       Did you ever speak or communicate with   02:50:34  
9       Mr. Rowell about Sullivan|Strickler's work in         02:50:37  
10      Coffee County in January of 2021?                     02:50:40

11          A       I don't think so.                           02:50:43

12          Q       Do you know Harry McDougland?            02:51:14

13          A       I don't think so.                           02:51:20

14          Q       He was an attorney for Cathy Latham.     02:51:23  
15      Do you recall talking to him?                           02:51:27

16          A       I don't.                                     02:51:29

17          Q       Did you speak with Cathy Latham about     02:51:39  
18      her meetings at the Willard Hotel in December of     02:51:42  
19      2020?   02:51:45

20          A       The Willard Hotel? I don't believe         02:51:46  
21      so.   02:51:49

1 Q Did you talk to her about her meeting 02:51:49  
2 with Julianni or Michael Flynn or Sidney Powell? 02:51:51  
3 A I don't recall it if I did. I don't 02:52:01  
4 think I did. 02:52:04  
5 Q Do you know if any members of the 02:52:04  
6 general assembly were told about 02:52:07  
7 Sullivan|Strickler's work in Coffee County? 02:52:09  
8 A I do not know. 02:52:12  
9 Q Do you know if Mr. Ligom, Bill Ligom 02:52:14  
10 was aware or had been told about it? 02:52:17  
11 A I don't know. 02:52:23  
12 Q What about Burt Jones? 02:52:23  
13 A I don't know. 02:52:27  
14 Q Are you aware of other counties where 02:52:28  
15 voting systems were imaged or forensic data 02:52:31  
16 collected? 02:52:35  
17 A I'm not. 02:52:36  
18 Q Did you talk with anyone about -- 02:52:48  
19 well, before Ms. Hampton was terminated did you 02:52:50  
20 talk with anybody about her termination? 02:52:53  
21 A In that recent time frame prior to her 02:52:58

1 | being terminated, I don't think so. 02:53:01

2	Q	Do you know James Barnes?	02:53:18
---	---	---------------------------	----------

3	A	James Barnes?	02:53:21
---	---	---------------	----------

4	Q	Well, let me just say --	02:53:23
---	---	--------------------------	----------

5	A	Was there a Mr. Barnes that used to	02:53:27
---	---	-------------------------------------	----------

6	work for the state years ago?	02:53:29
---	-------------------------------	----------

7	Q	Yes, that's Michael Barnes. James	02:53:31
---	---	-----------------------------------	----------

8 Barnes was Misty Hampton's replacement. Do you 02:53:35

9	recall him?	02:53:39
---	-------------	----------

10	A	I don't think I ever met him.	02:53:40
----	---	-------------------------------	----------

11	Q	Did you know that in June of 2021 the	02:53:42
----	---	---------------------------------------	----------

12	Secretary of State replaced Coffee County's EMS	02:53:46
----	---	----------

13	server and ICC scanner?	02:53:51
----	-------------------------	----------

14	A	I read that on some threads online.	02:53:56
----	---	-------------------------------------	----------

15	Q	Is that when it happened or more	02:53:58
----	---	----------------------------------	----------

16	recently?	02:54:00
----	-----------	----------

17	A	I don't know. It may have been	02:54:03
----	---	--------------------------------	----------

18	Marilyn's threads that were posted that I read	02:54:05
----	--	----------

19	that on.	02:54:08
----	----------	----------

20	Q	Do you know anything about why they	02:54:10
----	---	-------------------------------------	----------

21	did that or the circumstances?	02:54:11
----	--------------------------------	----------

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1           A       I don't know anything about it.           02:54:14

2           Q       Other than what you read on Twitter or       02:54:17

3 something, do you know anything about it at all?       02:54:19

4           A       No.           02:54:21

5           Q       Did you speak with anybody associated       02:54:27

6 with Coffee County after learning about the EMS       02:54:29

7 server being replaced?           02:54:32

8           A       No, sir.           02:54:37

9                   MR. BROWN: I will mark Tab 26 as the       02:54:41

10 next exhibit. It should be 18.           02:54:43

11                   Wait a minute. Whoa. That's wrong.       02:54:48

12                   I'm sorry, let me mark Tab 28 as the       02:55:16

13 next exhibit, which I think is Exhibit 18.           02:55:19

14                   (Voyles Deposition Exhibit No. 18 was       02:55:30

15 marked for identification.)           02:55:30

16 BY MR. BROWN:           02:55:51

17           Q       Let me just ask another question. I       02:55:52

18 didn't ask it very well before, and if this is       02:55:53

19 duplicative, I'm sorry.           02:55:57

20                   Did you know that Ms. Hampton was       02:55:59

21 going to be terminated before the board meeting in       02:56:01

1       which the board decided to terminate her?       02:56:04

2               A       No, sir.       02:56:07

3               Q       You first learned of her termination       02:56:08

4       from who?       02:56:10

5               A       From her.       02:56:11

6               Q       Looking at Exhibit 18, do you see that       02:56:17

7       photograph?       02:56:20

8               A       With the gentleman in a blue shirt and       02:56:22

9       blue hat?       02:56:25

10              Q       Yes.       02:56:26

11              A       Yes, sir.       02:56:27

12              Q       Who is that?       02:56:27

13              A       I do not know.       02:56:28

14                      MR. BROWN: Let me make Tab 27       02:56:35

15       Exhibit 19.       02:56:37

16                      MS. CONAWAY: Mr. Brown, I don't think       02:56:58

17       I have a Tab 27.       02:57:01

18                      MR. BROWN: Okay. I do have a Tab 27       02:57:04

19       so if you could ...       02:57:22

20                      Okay, we will skip that one. We will       02:57:35

21       skip 19. That was a fake exhibit.       02:57:37

1                   If you will take a look at Tab 26.                   02:58:30

2           I'm going to mark Tab 26 as Exhibit 19, I think.           02:59:02

3                   (Voyles Deposition Exhibit No. 19 was           02:59:08

4           marked for identification.)                   02:59:08

5                   MR. GRUBMAN: All right, we got it.           02:59:10

6           BY MR. BROWN:                   02:59:19

7                   Q       Who is the man standing in the           02:59:20

8           doorway? Well, there is actually two men there           02:59:22

9           but who is the man on the right standing in the           02:59:24

10          doorway?                   02:59:28

11                  A       I think that's me in the red shirt           02:59:28

12          leaning on the counter. And that appears to be           02:59:31

13          Jimmy Kitchens in the door. And it looks like           02:59:34

14          Tony Rowell with the cup of coffee.           02:59:40

15                  Q       And who is Mr. Kitchens?           02:59:44

16                  A       He is a county commissioner.           02:59:46

17                  Q       And the date of this is December 7,           02:59:56

18          2020; is that right?           02:59:59

19                  A       That's what it shows on the picture up           03:00:02

20          there, yes, sir.           03:00:05

21                  Q       Was Mr. Kitchens aware of the desire           03:00:11

1 to bring in a forensic team to have access to the 03:00:14  
2 election equipment? 03:00:18

3 A I have no idea. 03:00:20

4 Q Do you know if any of the board of 03:00:22  
5 commissioners was aware of that effort? 03:00:24

6 A I have no idea. 03:00:27

7 Q Have you been contacted by the 03:00:45  
8 Secretary of State as a part of any investigation 03:00:49  
9 into the copying in January of 2021? 03:00:53

10 A No, sir. 03:01:02

11 Q Anything about it at all. I mean, not 03:01:05  
12 just specifically Sullivan|Strickler but anything 03:01:08  
13 related to the copying or access to the election 03:01:11  
14 equipment in Coffee County. Nothing at all? 03:01:15

15 A No, sir. 03:01:19

16 Q Same question for the state election 03:01:20  
17 board. Have they contacted you about the events 03:01:23  
18 of January 7th in Coffee County? 03:01:27

19 A No, sir. 03:01:29

20 Q Same question for GBI. 03:01:30

21 A I received a phone call. 03:01:33

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1 Q From the GBI? 03:01:37

2 A Yes, sir. 03:01:38

3 Q When did you receive a phone call from 03:01:39  
4 the GBI? 03:01:40

5 A I would have to look up the date but 03:01:42  
6 it has probably been a month ago. 03:01:52

7 Q A month ago? 03:01:55

8 A That's a wild guess. 03:01:55

9 Q That is all right, but within the last 03:01:59  
10 couple of months, fair to say? 03:02:00

11 A Yes, sir. 03:02:02

12 Q Have you been contacted by the Fulton 03:02:03  
13 DA? 03:02:07

14 A No, sir. 03:02:07

15 Q Did you speak in substance with the 03:02:08  
16 GBI or give an interview or give them some 03:02:10  
17 information? 03:02:14

18 A No, sir. 03:02:15

19 Q Did you set up a time to meet with 03:02:16  
20 them to talk in greater detail or what was the 03:02:18  
21 substance of your discussion? 03:02:20

1           A       I gave them my attorney's name and       03:02:22  
2       number.       03:02:24

3           Q       Is that it?       03:02:25

4           A       Yes, sir.       03:02:26

5           Q       What about the FBI? Have you been       03:02:30  
6       contacted by the FBI?       03:02:33

7           A       No, sir.       03:02:35

8           Q       Have you turned over any documents to       03:02:36  
9       the GBI, the FBI, the state election board or the       03:02:37  
10       Secretary of State relating to the Coffee County       03:02:44  
11       elections?       03:02:46

12          A       No, sir.       03:02:47

13          Q       Are you aware of anyone else in Coffee       03:02:50  
14       County being interviewed by or spoken to by the       03:02:52  
15       GBI, Secretary of State, state election board or       03:02:57  
16       the FBI?       03:03:01

17          A       No, sir, I'm not aware.       03:03:03

18          Q       Do you know Mickey or Micci Ellis?       03:03:12

19          A       I do know Micci Ellis.       03:03:17

20          Q       And is it a she?       03:03:19

21          A       It is, yes.       03:03:22

1 Q Who is she? 03:03:24

2 A Micci is -- she is a concerned citizen 03:03:27

3 that lives in Douglas that I used to live in the 03:03:31

4 same neighborhood. She is the spouse of Will 03:03:35

5 Ellis, a friend of mine. 03:03:38

6 Q And have you spoken with her about 03:03:42

7 Coffee County elections? 03:03:45

8 A No. Not in the context of any of 03:03:48

9 this, no. 03:03:52

10 Q And then you know Cathy Latham, 03:03:54

11 correct? 03:03:58

12 A Yes, sir. 03:03:59

13 Q And just in general, did you at any 03:04:03

14 point learn Cathy Latham's role in setting up or 03:04:07

15 following through with Sullivan|Strickler's work? 03:04:13

16 A I don't know. 03:04:18

17 Q Do you know David Bossie? 03:04:21

18 A No, sir. 03:04:24

19 Q Do you know, have you ever spoken to 03:04:25

20 David Bossie? 03:04:29

21 A Not that I'm aware of. 03:04:31

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1	Q	Do you know Preston Haliburton?	03:04:33
2	A	No, sir.	03:04:37
3	Q	Do you know Alex Kaufman?	03:04:49
4	A	No, sir.	03:04:52
5	Q	Do you recall ever meeting with Alex	03:04:53
6		Kaufman in Coffee County in December of 2020?	03:04:54
7	A	I do not.	03:05:00
8	Q	Do you recall meeting with, I may have	03:05:07
9		asked this, but do you recall ever meeting with	03:05:10
10		Mr. Sinners?	03:05:12
11	A	I do not.	03:05:14
12	Q	Do you know Cleta Mitchell?	03:05:17
13	A	I do not.	03:05:21
14	Q	Do you know or have you ever	03:05:22
15		communicated with Russell Ramsland?	03:05:23
16	A	No, sir.	03:05:28
17	Q	Have you ever communicated with Phil	03:05:28
18		Waldron?	03:05:30
19	A	No, sir.	03:05:33
20	Q	Have you ever communicated with James	03:05:33
21		Penrose?	03:05:36

1 A No, sir. 03:05:37

2 Q Have you ever communicated with 03:05:42

3 Stephanie Lambert? 03:05:43

4 A No, sir. 03:05:46

5 Q Have you ever communicated with Conan 03:05:48

6 Hayes? 03:05:52

7 A Not that I'm aware of, no. 03:05:54

8 Q How about Peter Sharar, S-h-a-r-a-r? 03:05:56

9 A No, sir, not that I'm aware of. 03:06:01

10 Q And I believe you already testified 03:06:03

11 that you do not know Alex Cruce, correct? 03:06:04

12 A Correct. 03:06:12

13 Q And you do not know what role, if any, 03:06:12

14 he had in setting up or doing the work with 03:06:14

15 Sullivan|Strickler, right? 03:06:17

16 A I do not. 03:06:19

17 Q We looked at some meeting minutes that 03:07:13

18 had you as a guest to the November board meeting. 03:07:15

19 Were you a guest speaker or did you just attend 03:07:18

20 the meeting? 03:07:21

21 A Just attended. I was in town, went to 03:07:22

1	the meeting.	03:07:25
2	Q Have you ever communicated with Kurt	03:07:40
3	Hilbert?	03:07:41
4	A Who?	03:07:45
5	Q Kurt Hilbert. He is a lawyer in	03:07:46
6	Atlanta.	03:07:49
7	A Not that I'm aware of, no, sir.	03:07:51
8	Q Have you ever communicated with Lin	03:07:53
9	Wood?	03:07:56
10	A No, sir.	03:08:01
11	Q Have you ever communicated with	03:08:01
12	Charles Bundren, B-u-n-d-r-e-n?	03:08:03
13	A No, sir.	03:08:07
14	Q Do you know Curt Olsen?	03:08:07
15	A In that one thing that we saw on the	03:08:09
16	screen shot. That's all I have ever heard of him.	03:08:12
17	Q Have you ever spoken with or do you	03:08:16
18	know Kevin Moncla, M-o-n-c-l-a?	03:08:19
19	A No, sir.	03:08:24
20	Q I believe you testified that you had	03:08:36
21	not spoken with Burt Jones about the Coffee County	03:08:38

1 voting system and the need for a forensic audit? 03:08:45

2 A No, sir, not about that. I have 03:08:48

3 spoken to him on the phone one time in my life 03:08:50

4 that I'm aware of. 03:08:54

5 MR. BROWN: I'm going to make Tab 39 03:09:18

6 the next exhibit. I think it is Exhibit 20; is 03:09:20

7 that correct? 03:09:34

8 THE REPORTER: Yes. 03:09:35

9 (Voyles Deposition Exhibit No. 20 was 03:09:35

10 marked for identification.) 03:09:35

11 THE WITNESS: Could I go to the 03:09:40

12 restroom while you do that? 03:09:40

13 MR. GRUBMAN: Let's just take a 03:09:40

14 two-minute break. 03:09:41

15 MR. BROWN: I am winding up so let's 03:09:43

16 take ten and I will try to wrap it up. Thanks. 03:09:45

17 MR. GRUBMAN: Okay, thanks. 03:09:49

18 THE WITNESS: Thank you. 03:09:51

19 THE VIDEO OPERATOR: The time on the 03:09:52

20 monitor is 3:10 p.m. and we are off the record. 03:09:53

21 (Recess taken -- 3:10 p.m.) 03:09:58

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1 (After recess -- 3:22 p.m.) 03:10:03

2 THE VIDEO OPERATOR: Stand by. 03:21:37

3 All right, the time on the monitor is 03:22:04

4 3:22 p.m. and we are on the record. 03:22:06

5 MR. BROWN: We are back on the record 03:22:11

6 and I would like to mark Tab 27 as Exhibit 21. If 03:22:12

7 you could take a quick look at this. 03:22:22

8 THE REPORTER: Excuse me, Mr. Brown. 03:22:37

9 We have no Exhibit 20 in the folder. 03:22:39

10 MR. BROWN: Okay, then this is 03:22:45

11 Exhibit 20. My apologies. 03:22:46

12 MS. CONAWAY: Mr. Brown, I think there 03:22:50

13 was a glitch in the upload, so Exhibit 20 is Tab 03:22:57

14 39 and Exhibit 21 is Tab 27. 03:23:01

15 MR. BROWN: Okay. Yes, I switched the 03:23:08

16 sequence of this, Jenna, I apologize. So let's 03:23:14

17 look at Exhibit 21 which is Tab 27. 03:23:17

18 MR. GRUBMAN: All right, we got that. 03:23:21

19 (Voyles Deposition Exhibit No. 21 was 03:23:22

20 marked for identification.) 03:23:22

21

1 BY MR. BROWN: 03:23:24

2 Q Do you recognize the man in this 03:23:24

3 photograph? 03:23:27

4 A No, sir. 03:23:29

5 Q And just for the record, that is a 03:23:31

6 January 6, 2021 photograph, it appears. 03:23:33

7 A That's what it says on there, yes, 03:23:38

8 sir. 03:23:40

9 Q Let's turn to what has previously been 03:23:48

10 marked as Exhibit 20, which is Tab 39. 03:23:51

11 MR. GRUBMAN: Got it. 03:23:59

12 Q Go ahead. Mine is frozen. Hang on. 03:24:07

13 Exhibit 20 is an e-mail from you to 03:24:24

14 Judy Foskey. Do you know who that is? 03:24:29

15 A She used to work at the election 03:24:36

16 office long ago. 03:24:38

17 Q And do you see if you go down, do you 03:24:39

18 see your e-mail to Lin Wood? 03:24:41

19 A Yes, sir. 03:24:43

20 Q What prompted you to write Mr. Wood? 03:24:50

21 A I guess because he was so active in 03:24:54

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1 the whole case thing. 03:24:57

2 Q What was the connection between 03:25:01

3 Mr. Wood and efforts by Sullivan|Strickler in 03:25:02

4 January, if any? 03:25:07

5 A I have no idea. 03:25:09

6 Q Do you know who found 03:25:13

7 Sullivan|Strickler to be the contractors to come 03:25:17

8 in there and do that work? 03:25:20

9 A No, sir. 03:25:22

10 Q Did you have any other communications 03:25:29

11 with Mr. Wood? 03:25:30

12 A No, sir. No replies either. 03:25:31

13 MR. BROWN: We are going to mark 03:25:43

14 Tab 37 as Exhibit 22. 03:25:44

15 (Voyles Deposition Exhibit No. 22 was 03:25:47

16 marked for identification.) 03:25:47

17 BY MR. BROWN: 03:26:11

18 Q Do you have that in front of you? 03:26:12

19 A Yes, sir. 03:26:14

20 Q If you scroll down you will see an 03:26:15

21 e-mail from you to blake@tilleryfirm. 03:26:17

1 Do you see that? 03:26:21

2 A Is it on the first page of -- oh, yes, 03:26:24

3 I see it. 03:26:30

4 Q Who is blake@tilleryfirm? 03:26:31

5 A Blake Tillery. I think he is a 03:26:34

6 senator. 03:26:37

7 Q Georgia Senator? 03:26:41

8 A Yes, sir. 03:26:44

9 Q Do you recall the purpose of that 03:26:45

10 communication? 03:26:47

11 A What is the date there, December 29? 03:26:49

12 I think this is when they were having the 03:26:51

13 hearings. 03:26:53

14 Q The hearing, the State of Georgia 03:26:58

15 hearings? 03:27:02

16 A Yes, sir. And I was trying to just 03:27:03

17 make people aware of the vulnerabilities so they 03:27:06

18 could correct deficiencies, I suppose. 03:27:15

19 Q And at the top of that exhibit is an 03:27:18

20 e-mail from you to John Holmes. 03:27:21

21 Do you see that? 03:27:23



1       it might have been the one that we drafted. I       03:28:57  
2       can't remember if it was before or after that.       03:29:00  
3           Q       And who is Carden Summers?       03:29:03  
4           A       He is a state representative also. I       03:29:06  
5       think representative.       03:29:11  
6                   MR. BROWN: We are going to mark       03:29:13  
7       Tab 42 as the next exhibit, I think Exhibit 24.       03:29:15  
8                   (Voyles Deposition Exhibit No. 24 was       03:29:19  
9       marked for identification.)       03:29:19  
10                  MR. GRUBMAN: Got it.       03:29:37  
11       BY MR. BROWN:       03:29:37  
12           Q       And this is an e-mail to you from, is       03:29:38  
13       it senator or representative Carden? I can't       03:29:43  
14       remember.       03:29:45  
15           A       I can't remember either.       03:29:49  
16           Q       And you are forwarding to him the       03:29:50  
17       meeting minutes; is that right?       03:29:52  
18           A       Yes, sir, that's what it says there.       03:29:54  
19           Q       Was this also for the purpose of       03:29:56  
20       explaining the vulnerability of the system?       03:30:00  
21           A       Yes, sir.       03:30:07

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1	Q	After the access was given to	03:30:20
2		Sullivan Strickler in January, I take it you	03:30:27
3		didn't hear much about that for a while until it	03:30:31
4		came out in the news much later, right?	03:30:34
5	A	Correct.	03:30:37
6	Q	When did you first come across it in	03:30:38
7		the news?	03:30:40
8	A	Geez, I have no idea.	03:30:42
9	Q	Were you surprised that it was a	03:30:46
10		newsworthy, or apparently a newsworthy event?	03:30:48
11	A	I don't -- I don't remember how I	03:30:54
12		would have reacted at the time.	03:30:55
13	Q	Okay.	03:30:59
14		MR. BROWN: That's all the questions	03:31:02
15		that I have at this time. Thank you for your	03:31:02
16		cooperation today.	03:31:06
17		And Mr. Grubman, I will be back in	03:31:09
18		touch with you about the documents after we have a	03:31:11
19		better chance to review what we got and what we	03:31:14
20		need.	03:31:17
21		MR. GRUBMAN: Thanks.	03:31:18

1 MR. BROWN: I do not know if others 03:31:20  
2 have questions, so don't leave yet. 03:31:21  
3 THE REPORTER: And I will also need a 03:31:27  
4 few spellings. 03:31:29  
5 MR. BROWN: Do you want that from me 03:31:36  
6 or from the witness? 03:31:37  
7 THE REPORTER: Witness. 03:31:39  
8 MS. LaROSS: Can you guys hear me? 03:31:43  
9 MR. BROWN: Yes. 03:31:46  
10 MS. LaROSS: It's Diane LaRoss. Can 03:31:46  
11 you guys hear me? 03:31:48  
12 MR. BROWN: Yes. 03:31:51  
13 MS. LaROSS: So we don't have any 03:31:53  
14 questions. 03:31:55  
15 Mr. Voyles, thank you for your time 03:31:56  
16 today. 03:31:58  
17 THE VIDEO OPERATOR: We are off the 03:32:05  
18 record at 3:32 p.m., and this concludes today's 03:32:06  
19 testimony given by Blake Edward Voyles. The total 03:32:10  
20 number of media used was three and will be 03:32:14  
21 retained by Veritext. 03:32:17

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1	MR. BROWN: Thank you, Mr. Voyles.	03:32:40
2	You all be safe.	03:32:40
3	THE REPORTER: The first question that	03:32:40
4	I have, is there anyone who wants a copy of this	03:32:40
5	transcript?	03:32:40
6	MR. BROWN: Yes.	03:32:40
7	MS. LaROSS: We would like to read and	03:32:40
8	sign. Yes, we would like a copy for the	03:32:42
9	defendants.	03:32:46
10	THE REPORTER: All right. Anyone	03:33:00
11	else?	03:33:00
12	And does anyone want rough draft on	03:33:01
13	this?	03:33:03
14	MR. BROWN: We don't.	03:33:04
15	MS. LaROSS: Hang on for just a	03:33:12
16	second. I will check, Cappy.	03:33:13
17	THE REPORTER: All right. Thank you.	03:33:14
18	(Thereupon, signature having not been	03:33:14
19	waived, the examination of BLAKE EDWARD VOYLES was	03:33:14
20	concluded at 3:42 p.m.)	03:33:14
21	- - - - -	03:33:14

1 UNITED STATES OF AMERICA )

2 STATE OF MARYLAND )

3  
4 I, CAPPY HALLOCK, the reporter before  
5 whom the foregoing deposition was taken, do hereby  
6 certify that the witness whose testimony appears  
7 in the foregoing deposition was sworn by me; that  
8 said deposition is a true record of the testimony  
9 given by said witness.

10 I further certify that I am neither  
11 counsel for, related to, nor employed by any of  
12 the parties to the action in which this deposition  
13 was taken; and further that I am not a relative or  
14 employee of any attorney or counsel employed by  
15 the parties hereto, or financially or otherwise  
16 interested in the outcome of this action.

17  
18 

19 \_\_\_\_\_  
20 Cappy Hallock, RPR, CRR

21 My Commission expires January 19, 2025

1 Scott Grubman, Esquire

2 sgrubman@sglawfirm.com

3 December 2, 2022

4 RE: Curling, Donna v. Raffensperger, Brad

5 11/16/2022, Blake Edward Voyles (#5584994)

6 The above-referenced transcript is available for  
7 review.

8 Within the applicable timeframe, the witness should  
9 read the testimony to verify its accuracy. If there are  
10 any changes, the witness should note those with the  
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of  
13 Deponent and Errata and return to the deposing attorney.  
14 Copies should be sent to all counsel, and to Veritext at  
15 cs-midatlantic@veritext.com

16  
17 Return completed errata within 30 days from  
18 receipt of testimony.

19 If the witness fails to do so within the time  
20 allotted, the transcript may be used as if signed.

21  
22 Yours,

23 Veritext Legal Solutions  
24  
25

1 Curling, Donna v. Raffensperger, Brad

2 Blake Edward Voyles (#5584994)

3 E R R A T A S H E E T

4 PAGE\_\_\_\_\_ LINE\_\_\_\_\_ CHANGE\_\_\_\_\_

5 \_\_\_\_\_

6 REASON\_\_\_\_\_

7 PAGE\_\_\_\_\_ LINE\_\_\_\_\_ CHANGE\_\_\_\_\_

8 \_\_\_\_\_

9 REASON\_\_\_\_\_

10 PAGE\_\_\_\_\_ LINE\_\_\_\_\_ CHANGE\_\_\_\_\_

11 \_\_\_\_\_

12 REASON\_\_\_\_\_

13 PAGE\_\_\_\_\_ LINE\_\_\_\_\_ CHANGE\_\_\_\_\_

14 \_\_\_\_\_

15 REASON\_\_\_\_\_

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18 REASON\_\_\_\_\_

19 PAGE\_\_\_\_\_ LINE\_\_\_\_\_ CHANGE\_\_\_\_\_

20 \_\_\_\_\_

21 REASON\_\_\_\_\_

22 \_\_\_\_\_

23 \_\_\_\_\_

24 Blake Edward Voyles

Date

25

1 Curling, Donna v. Raffensperger, Brad

2 Blake Edward Voyles (#5584994)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Blake Edward Voyles, do hereby declare that I  
5 have read the foregoing transcript, I have made any  
6 corrections, additions, or changes I deemed necessary as  
7 noted above to be appended hereto, and that the same is  
8 a true, correct and complete transcript of the testimony  
9 given by me.

10  
11 \_\_\_\_\_  
12 Blake Edward Voyles

\_\_\_\_\_ Date

13 \*If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_.

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19 NOTARY PUBLIC  
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